

United States Environmental Protection Agency
Criminal Investigation Division
Investigative Activity Report

Case Number

1000-0458

Case Title:

Industrial Container Services - WA LLC

Reporting Office:

Seattle, WA, Area Office

Subject of Report:

20140425 Closing Letters Sent

Activity Date:

April 25, 2014

Reporting Official and Date:

[REDACTED]

Special Agent

05-MAY-2014, Signed by: [REDACTED]

Approving Official and Date:

[REDACTED]

Special Agent in Charge

06-MAY-2014, Approved by: [REDACTED]

Special Agent in Charge

SYNOPSIS

On April 25, 2014, EPA CID Administrative Assistant [REDACTED] sent out closing referral letters to [REDACTED] of the Puget Sound Clean Air Agency and [REDACTED] of King County Waste Water.

DETAILS

On April 25, 2014, EPA CID Administrative Assistant [REDACTED] sent out closing referral letters to [REDACTED] of the Puget Sound Clean Air Agency and [REDACTED] of King County Waste Water.

These letters were a follow up to the case closure meeting I had with both of these individuals and representatives of several other interested agencies on February 11, 2014.

These letters explained that EPA CID has concluded its investigation and is closing the case.

ATTACHMENT

Closing Refer Letter 1000-0458 Industrial Container Services 04.25.14.pdf

Closing Refer Letter 1000-0458 Industrial Container Services - [REDACTED] 04 25 14.pdf

This document contains neither recommendations nor conclusions of the EPA.
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF CRIMINAL ENFORCEMENT, FORENSICS, & TRAINING
CRIMINAL INVESTIGATION DIVISION
SEATTLE AREA OFFICE
1200 Sixth Avenue, CID
Seattle, Washington 98101-1128

APR 24 2014

[REDACTED]
Supervising Inspector
Puget Sound Clean Air Agency
1904 Third Ave Suite 105
Seattle, WA 98101

Re: Notification of Closed Case
CID Case No. 1000-0458 Industrial Container Services - WA LLC
ENFORCEMENT CONFIDENTIAL

Dear Inspector [REDACTED]

This office has been conducting an investigation into alleged environmental violations pertaining to Industrial Container Services (ICS) located in Seattle, Washington. The investigation concerned allegations of violations of the Clean Air Act and the Clean Water Act, which included the dumping of large amounts of unknown chemicals into the local sewer treatment system.

On February 11, 2014, Special Agent [REDACTED] last discussed this matter with you and several other environmental agency personnel. In addition to the suspected regulatory violations, the potential exposure to workers to hazardous chemicals was discussed.

This matter is now being officially referred to your office for whatever action you deem appropriate. If you have any follow-up questions or an interest in reviewing the CID enforcement file on this matter, please contact SA [REDACTED]

Sincerely,

[REDACTED]
Special Agent in Charge

cc: Case File





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF CRIMINAL ENFORCEMENT, FORENSICS, & TRAINING
CRIMINAL INVESTIGATION DIVISION
SEATTLE AREA OFFICE
1200 Sixth Avenue, CID
Seattle, Washington 98101-1128

APR 24 2014

[REDACTED]
Industrial Waste Compliance Investigator
King County Waste Water
130 Nickerson St Ste 200
Seattle, WA 98109

Re: Notification of Closed Case
CID Case No. 1000-0458 Industrial Container Services - WA LLC
ENFORCEMENT CONFIDENTIAL

Dear Investigator [REDACTED]

This office has been conducting an investigation into alleged environmental violations pertaining to Industrial Container Services (ICS) located in Seattle, Washington. The investigation concerned allegations of violations of the Clean Air Act and the Clean Water Act, which included the dumping of large amounts of unknown chemicals into the local sewer treatment system.

On February 11, 2014, Special Agent [REDACTED] last discussed this matter with you and several other environmental agency personnel. In addition to the suspected regulatory violations, the potential exposure to workers to hazardous chemicals was discussed.

This matter is now being officially referred to your office for whatever action you deem appropriate. If you have any follow-up questions or an interest in reviewing the CID enforcement file on this matter, please contact SA [REDACTED]

Sincerely,

[REDACTED]
Special Agent in Charge

cc: Case File



United States Environmental Protection Agency
Criminal Investigation Division
Investigative Activity Report

Case Number

1000-0458

Case Title:

Industrial Container Services - WA LLC

Reporting Office:

Seattle, WA, Area Office

Subject of Report:

20140505 Closing of Industrial Container Services Case Investigation.

Activity Date:

May 1, 2014

Reporting Official and Date:

[REDACTED]

Special Agent

10-JUN-2014, Signed by: [REDACTED]

Approving Official and Date:

[REDACTED]

Special Agent in Charge

23-JUN-2014, Approved by: [REDACTED]

Special Agent in Charge

SYNOPSIS

On May 5, 2014, SA [REDACTED] closed the Industrial Container Services case investigation.

DETAILS

This investigation was initiated after a worker at Industrial Container Services (ICS), [REDACTED] alleged illegal disposal and burning of waste was occurring at ICS.

This company cleans and refurbishes steel and poly drums at its facility. The suspected illegal activity relates to the drum cleaning process at the facility. Drums are arriving at the plant containing on average of one quarter to one half full of waste. The witness contends that some of the drum contents are petroleum wastes used in the "fracking" process. This causes difficulty for the personnel as there is not adequate personal protection equipment (PPE) available at the plant when this waste is burned during the refurbishing process.

After obtaining and reviewing video and photographic evidence of the potential illegal practices at ICS, a follow-up civil inspection was determined to be the appropriate next step. This case was transferred to Puget Sound Clean Air Agency and King County Waste Water by meeting and letter. The Clean Air Act requires a thirty (30) day notice to a company regarding their air violations.

During the case closure, the case agent confirmed the following information:

The evidence gathered during the investigation was returned to the complainant on 4/1/2014 via UPS.

EPA Suspension and Debarment: Not Applicable

Search Warrant Material: No search warrant material was obtained in this investigation.

Grand Jury Material: No Grand Jury material obtained in this investigation.

Samples: Samples are held at NEIC and have been ordered disposed of under their guidance.

There are no Duplicate Case File Records.

NCFL-TEC: Electronic evidence collected returned to NCFL for destruction.

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Criminal Investigation Division
Investigative Activity Report

Case Number

1000-0458

Final Judicial Action: This investigation was forwarded to State and Local agencies for follow up.

Booker Form: Not applicable.

The Seattle Area Office retains no property or other items that require return or destruction in this investigation.

This investigation is closed.

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United States Environmental Protection Agency
Criminal Investigation Division
Investigative Activity Report

Case Number

1000-M463

Case Title:

Industrial Container Services - WA LLC

Reporting Office:

Seattle, WA, Area Office

Subject of Report:

20130305 Meeting with [REDACTED] of the EPA Manchester Laboratory.

Activity Date:

March 5, 2013

Reporting Official and Date:

[REDACTED]

Special Agent

05-MAR-2013, Signed by: [REDACTED]

Approving Official and Date:

[REDACTED]

Special Agent in Charge

05-MAR-2013, Approved by: [REDACTED] e [REDACTED]

SYNOPSIS

On March 5, 2013, SA [REDACTED] met with [REDACTED] of the EPA Manchester Laboratory for the purpose of transferring the evidence given during the Name interview on February 27, 2013.

DETAILS

On March 5, 2013, I met with [REDACTED] of the EPA Manchester Laboratory for the purpose of transferring the evidence located at the Seattle Area Office, which was given to SA [REDACTED] and I during the Name interview on February 27, 2013.

The evidence was transferred to [REDACTED] under the attached Chain of Custody forms.

This evidence will be stored by the Manchester Lab until further notice and testing.

ATTACHMENT

20130305 Name Evidence Transfer.pdf

20130305 Richmond Transfer Sheet.pdf

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**United States Environmental Protection Agency
Office of Criminal Enforcement, Forensics, and Training**

CHAIN OF CUSTODY


Case Title:		Office:	Case Number:
Industrial Container Systems – WA, LLC		Seattle	1000-M463
Location Collected:		Date Collected:	<input type="checkbox"/> Search Warrant <input type="checkbox"/> Grand Jury Subpoena <input checked="" type="checkbox"/> Safekeeping <input type="checkbox"/> Eavesdropping / Surveillance <input type="checkbox"/> Other
Seattle, Washington		02/27/13	
Name and address of owner: <input type="checkbox"/> Return to Owner			Storage Location:
N/A			Seattle Evidence Room
			Date Removed from Storage:
Remarks:			
Collected by:	Signature	Relinquished to:	Date:
SA [REDACTED]	[Signature]	Evidence Room	02/28/13
Relinquished to:	Date:	Relinquished to:	Date:
[REDACTED]	3/5/13		
Relinquished to:	Date:	Relinquished to:	Date:
[REDACTED]			
Relinquished to:	Date:	Relinquished to:	Date:
Exhibit Number	Description		
1	(1) Baggie containing burner ashes.		
2	(1) "Gatorade" bottle containing residual oil/ possible other chemicals.		
3			

**United States Environmental Protection Agency
Office of Criminal Enforcement, Forensics, and Training**

Sample Custody & Analysis Required Form

Form Effective Date: July 2005

Revision 1

Project Name ICS CIO SAMPLE		Project Code CDE-Z11A		Method of Shipment/carrier HAND		Airbill Number (if known prior to sealing):			
Account Code		EPA Project Manager/phone number		Check all that apply <input checked="" type="checkbox"/> Enforce/Custody <input type="checkbox"/> Possible Toxic/Hazardous <input type="checkbox"/> Data Confidential					
Sampler Names (Print & Sign). Mark (R) after name of principal recorder.  (R)		If applicable, circle the set of selected metals: Al Sb As Ba Be B Cd Ca Cr Co Cu Fe Pb Mg Mn Mo Ni K Se Ag Na Sn Ti V Zn (see reverse for more to add/circle)		① Matrix Codes: 10 Water/Liquid (Total) 20 Water/Liquid (Filtered) 40 Sediment/Soil/Solid/Bulk 70 Tissue 80 Oil/Solvent 44 Air filter 42 Wipe/Swab ¹ 00 ¹ PCB wipe is to be 10cm x 10cm (100 cm ²)		#C ② enter the number of containers for each preservative type followed by the appropriate preservation code P ③: A - HCl G - Na ₂ S ₂ O ₃ +EDTA B - HNO ₃ H - EDTA C - NaOH N - No chemical preservation D - H ₂ SO ₄ P - Bottles pre-preserved at lab E - Na ₂ S ₂ O ₃ T - To be preserved at the lab F - ascorbic acid ² , then HCl ² Na ₂ S ₂ O ₃ , if required by plan W -		Laboratory: see the applicable QAPP, SOW and/or Analytical Support Request for specific methods and detection, reporting, and/or quantitation limits	
Sampler's comments for the laboratory: SAMPLED BY CITIZEN * CIO HOLD * FROM BAZZEL ORGANIC COMPANY PETROLEUM/PESTICIDES UNKNOWN				<input type="checkbox"/> Check here if the cooler is iced ④ Enter the letter or range of letters on each container for each group of containers with the same preservative type. Each container for each unique sample number must have a unique letter on it.		Organics (see reverse) VOA BVA PCB PAH ICP Mercury Selected E. Coli T. Coliform F. Coliform TSS BOD 5 NO ₂ -NO ₃ Oil & Grease Asbestos Additional Write in Analyses (see reverse) TBD			
EPA Sample number Yr Wk Sequence 1 3 0 9 4 0 0 0		Sampling Date & Time Yr Mo Day Time 3/5/13 1145		Matrix ① #C ② P ③ X-2 N 1 W 2		Sampler Initials BML		Sample/Station Description/Field Measurements 1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100. 101. 102. 103. 104. 105. 106. 107. 108. 109. 110. 111. 112. 113. 114. 115. 116. 117. 118. 119. 120. 121. 122. 123. 124. 125. 126. 127. 128. 129. 130. 131. 132. 133. 134. 135. 136. 137. 138. 139. 140. 141. 142. 143. 144. 145. 146. 147. 148. 149. 150. 151. 152. 153. 154. 155. 156. 157. 158. 159. 160. 161. 162. 163. 164. 165. 166. 167. 168. 169. 170. 171. 172. 173. 174. 175. 176. 177. 178. 179. 180. 181. 182. 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1484. 1485. 1486. 1487. 1488. 1489. 1490. 1491. 1492. 1493. 1494. 1495. 1496. 1497. 1498. 1499. 1500. 1501. 1502. 1503. 1504. 1505. 1506. 1507. 1508. 1509. 1510. 1511. 1512. 1513. 1514. 1515. 1516. 1517. 1518. 1519. 1520. 1521. 1522. 1523. 1524. 1525. 1526. 1527. 1528. 1529. 1530. 1531. 1532. 1533. 1534. 1535. 1536. 1537. 1538. 1539. 1540. 1541. 1542. 1543. 1544. 1545. 1546. 1547. 1548. 1549. 1550. 1551. 1552. 1553. 1554. 1555. 1556. 1557. 1558. 1559. 1560. 1561. 1562. 1563. 1564. 1565. 1566. 1567. 1568. 1569. 1570. 1571. 1572. 1573. 1574. 1575. 1576. 1577. 1578. 1579. 1580. 1581. 1582. 1583. 1584. 1585. 1586. 1587. 1588. 1589. 1590. 1591. 1592. 1593. 1594. 1595. 1596. 1597. 1598. 1599. 1600. 1601. 1602. 1603. 1604. 1605. 1606. 1607. 1608. 1609. 1610. 1611. 1612. 1613. 1614. 1615. 1616. 1617. 1618. 1619. 1620. 1621. 1622. 1623. 1624. 1625. 1626. 1627. 1628. 1629. 1630. 1631. 1632. 1633. 1634. 1635. 1636. 1637. 1638. 1639. 1640. 1641. 1642. 1643. 1644. 1645. 1646. 1647. 1648. 1649. 1650. 1651. 1652. 1653. 1654. 1655. 1656. 1657. 1658. 1659. 1660. 1661. 1662. 1663. 1664. 1665. 1666. 1667. 1668. 1669. 1670. 1671. 1672. 1673. 1674. 1675. 1676. 1677. 1678. 1679. 1680. 1681. 1682. 1683. 1684. 1685. 1686. 1687. 1688. 1689. 1690. 1691. 1692. 1693. 1694. 1695. 1696. 1697. 1698. 1699. 1700. 1701. 1702. 1703. 1704. 1705. 1706. 1707. 1708. 1709. 1710. 1711. 1712. 1713. 1714. 1715. 1716. 1717. 1718. 1719. 1720. 1721. 1722. 1723. 1724. 1725. 1726. 1727. 1728. 1729. 1730. 1731. 1732. 1733. 1734. 1735. 1736. 1737. 1738. 1739. 1740. 1741. 1742. 1743. 1744. 1745. 1746. 1747. 1748. 1749. 1750. 1751. 1752. 1753. 1754. 1755. 1756. 1757. 1758. 1759. 1760. 1761. 1762. 1763. 1764. 1765. 1766. 1767. 1768. 1769. 1770. 1771. 1772. 1773. 1774. 1775. 1776. 1777. 1778. 1779. 1780. 1781. 1782. 1783. 1784. 1785. 1786. 1787. 1788. 1789. 1790. 1791. 1792. 1793. 1794. 1795. 1796. 1797. 1798. 1799. 1800. 1801. 1802. 1803. 1804. 1805. 1806. 1807. 1808. 1809. 1810. 1811. 1812. 1813. 1814. 1815. 1816. 1817. 1818. 1819. 1820. 1821. 1822. 1823. 1824. 1825. 1826. 1827. 1828. 1829. 1830. 1831. 1832. 1833. 1834. 1835. 1836. 1837. 1838. 1839. 1840. 1841. 1842. 1843. 1844. 1845. 1846. 1847. 1848. 1849. 1850. 1851. 1852. 1853. 1854. 1855. 1856. 1857. 1858. 1859. 1860. 1861. 1862. 1863. 1864. 1865. 1866. 1867. 1868. 1869. 1870. 1871. 1872. 1873. 1874. 1875. 1876. 1877. 1878. 1879. 1880. 1881. 1882. 1883. 1884. 1885. 1886. 1887. 1888. 1889. 1890. 1891. 1892. 1893. 1894. 1895. 1896. 1897. 1898. 1899. 1900. 1901. 1902. 1903. 1904. 1905. 1906. 1907. 1908. 1909. 1910. 1911. 1912. 1913. 1914. 1915. 1916. 1917. 1918. 1919. 1920. 1921. 1922. 1923. 1924. 1925. 1926. 1927. 1928. 1929. 1930. 1931. 1932. 1933. 1934. 1935. 1936. 1937. 1938. 1939. 1940. 1941. 1942. 1943. 1944. 1945. 1946. 1947. 1948. 1949. 1950. 1951. 1952. 1953. 1954. 1955. 1956. 1957. 1958. 1959. 1960. 1961. 1962. 1963. 1964. 1965. 1966. 1967. 1968. 1969. 1970. 1971. 1972. 1973. 1974. 1975. 1976. 1977. 1978. 1979. 1980. 1981. 1982. 1983. 1984. 1985. 1986. 1987. 1988. 1989. 1990. 1991. 1992. 1993. 1994. 1995. 1996. 1997. 1998. 1999. 2000. 2001. 2002. 2003. 2004. 2005. 2006. 2007. 2008. 2009. 2010. 2011. 2012. 2013. 2014. 2015. 2016. 2017. 2018. 2019. 2020. 2021. 2022. 2023. 2024. 2025. 2026. 2027. 2028. 2029. 2030. 2031. 2032. 2033. 2034. 2035. 2036. 2037.	

**United States Environmental Protection Agency
Criminal Investigation Division
Investigative Activity Report**

Case Number

1000-M463

Case Title:

Industrial Container Services - WA LLC

Reporting Office:

Seattle, WA, Area Office

Subject of Report:

20130228 Transfer of [REDACTED] evidence to the Seattle Area Office evidence room.

Activity Date:

February 28, 2013

Reporting Official and Date:

[REDACTED]

Special Agent

05-MAR-2013, Signed by: [REDACTED]

Approving Official and Date:

[REDACTED]

Special Agent in Charge

05-MAR-2013, Approved by: [REDACTED]

SYNOPSIS

On February 28, 2013, SA [REDACTED] transferred custody to the Seattle Area Office the evidence delivered by [REDACTED] to EPA CID during [REDACTED] interview of February 27, 2013.

DETAILS

On February 28, 2013, I transferred custody to the Seattle Area Office the evidence delivered by [REDACTED] to EPA CID during [REDACTED] interview of February 27, 2013.

During [REDACTED] interview, [REDACTED] delivered a bottle containing an unknown liquid and a small bag of ash residue. These items were taken from the production process of Industrial Container Services in Seattle, WA.

At the time of acceptance, SA [REDACTED] and I filled out an EPA property receipt. [REDACTED] declined to receive a receipt for these products.

ATTACHMENT

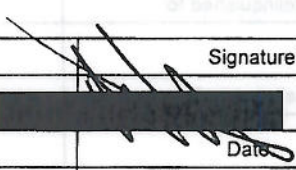
20130227 Receipt for waste.pdf

20130228 COC.pdf

This document contains neither recommendations nor conclusions of the EPA.
It is the property of the EPA and is loaned to your agency;
it and its contents are not to be distributed outside your agency.

**United States Environmental Protection Agency
Office of Criminal Enforcement, Forensics, and Training**

CHAIN OF CUSTODY

Case Title:		Office:		Case Number:	
Industrial Container Systems – WA, LLC		Seattle		1000-M463	
Location Collected:		Date Collected:		<input type="checkbox"/> Search Warrant <input type="checkbox"/> Grand Jury Subpoena <input checked="" type="checkbox"/> Safekeeping <input type="checkbox"/> Eavesdropping / Surveillance <input type="checkbox"/> Other	
Seattle, Washington		02/27/13			
Name and address of owner: <input type="checkbox"/> Return to Owner				Storage Location:	
N/A				Seattle Evidence Room	
				Date Removed from Storage:	
Remarks:					
Collected by:		Signature		Relinquished to:	
SA [REDACTED]				Evidence Room	
Relinquished to:		Date:		Date:	
				02/28/13	
Relinquished to:		Date:		Relinquished to:	
				Date:	
Relinquished to:		Date:		Relinquished to:	
				Date:	
Relinquished to:		Date:		Relinquished to:	
				Date:	
Relinquished to:		Date:		Relinquished to:	
				Date:	
Exhibit Number		Description			
1	(1) Baggie containing burner ashes.				
2	(1) "Gatorade" bottle containing residual oil/ possible other chemicals.				
3					

**United States Environmental Protection Agency
Office of Criminal Enforcement, Forensics, and Training**

Case Title:		Office:		Case Number:	
Location Collected:		Date Collected:		<input type="checkbox"/> Search Warrant <input type="checkbox"/> Grand Jury Subpoena <input type="checkbox"/> Safekeeping <input type="checkbox"/> Eavesdropping / Surveillance <input type="checkbox"/> Other	
Name and address of owner: <input type="checkbox"/> Return to Owner				Storage Location:	
				Date Removed from Storage:	
Remarks:					
Collected by:		Signature		Relinquished to:	
				Date:	
Relinquished to:		Date:		Relinquished to:	
				Date:	
Relinquished to:		Date:		Relinquished to:	
				Date:	
Relinquished to:		Date:		Relinquished to:	
				Date:	
Exhibit Number		Description			

**United States Environmental Protection Agency
Office of Criminal Enforcement, Forensics, and Training**

United States Environmental Protection Agency
Office of Criminal Enforcement, Forensics and Training
RECEIPT

RECEIVED FROM

CASE NUMBER

1000-M463

DATE

2/27/13

PURPOSE

OFFICE

SAFE KEEPING

SEATTLE

ITEM NO.

ITEM DESCRIPTION

(1)

Bagie containing Burner Asstes.

(2)

Bottle (gatorade) containing residual oil waste tank.

RECEIVED BY

DATE

SA

2/27/13

WITNESS

DATE

SA

2/27/13

**United States Environmental Protection Agency
Criminal Investigation Division
Investigative Activity Report**

Case Number

1000-M463

Case Title:

Industrial Container Services - WA LLC

Reporting Office:

Seattle, WA, Area Office

Subject of Report:

20130312 Meeting with King County Waste Water Treatment Division.

Activity Date:

March 12, 2013

Reporting Official and Date:

[REDACTED]

Special Agent

25-MAR-2013, Signed by: [REDACTED]

Approving Official and Date:

[REDACTED]

Special Agent in Charge

25-MAR-2013, Approved by: [REDACTED]

Assistant Special Agent in Charge

SYNOPSIS

On March 12, 2013, SA [REDACTED] met with representatives of the King County Waste Water Treatment Division regarding the activities of Industrial Container Services.

DETAILS

On March 12, 2013, I met with representatives of the King County Waste Water Treatment Division regarding the activities of Industrial Container Services. The meeting was held with [REDACTED] to explain that EPA CID is currently investigating some allegations of potentially illegal activities occurring at the ICS plant in Seattle, Washington.

During the meeting a history of the plant was discussed and I was given copies of the company's permits for review.

King County explained that they would be cooperative with any investigation.

ATTACHMENT

Application for Waste Water Discharge Permit.pdf
Waste Water Discharge Permit.pdf

This document contains neither recommendations nor conclusions of the EPA.
It is the property of the EPA and is loaned to your agency;
it and its contents are not to be distributed outside your agency.

Copy

1

You will find detailed instructions for completing each section of this application and each required exhibit in the enclosed packet, "Wastewater Discharge Permit Application Instructions and Guidelines." Review the entire application and instruction packet carefully before completing any part of the application.

This form and the instructions are also available on the Web at www.kingcounty.gov/IndustrialWaste.

- Submit one application for each site.
- King County Industrial Waste (KCIW) does not require an application fee. Once KCIW determines that you require a permit, KCIW will bill you prior to issuing you a draft permit.
- Answer all questions and include the required exhibits. **Incomplete applications will be returned to you.**
- If you do not have an answer for the requested information, indicate so and explain why.
- Indicate "N/A" if a section does not apply to your operations.
- Use additional pages, if needed.
- Send **three** copies of the completed application and exhibits to:

RECEIVED

MAY 13 2009

KING COUNTY
INDUSTRIAL WASTE

King County Industrial Waste
130 Nickerson Street, Suite 200
Seattle, WA 98109-1658

SECTION A - BUSINESS NAMES AND ADDRESSES

APPLICANT BUSINESS OR PROJECT NAME: <i>INDUSTRIAL CONTAINER SERVICES-WA, LLC</i>			
ADDRESS OF SITE DISCHARGING WASTEWATER: <small>(If no address, indicate cross streets.)</small>		BUSINESS MAILING ADDRESS:	
<i>7152 1st Ave. So.</i>		<i>7152 1st Ave. So.</i>	
Site Address		Mailing Address	
<i>Seattle, WA</i>	<i>98108</i>	<i>Seattle, WA</i>	<i>98108</i>
City, State	Zip Code	City, State	Zip Code

PRIMARY PERSON TO BE CONTACTED ABOUT THIS APPLICATION:			
Name: [REDACTED]		Title: <i>FACILITY GENERAL MANAGER</i>	
Mailing Address: <i>7152 1st Ave. So.</i>		Telephone No: [REDACTED]	
City, State: <i>Seattle, WA</i>		24-Hour Emergency Phone No: [REDACTED]	
Zip Code: <i>98108</i>		FAX No: [REDACTED]	
E-Mail Address: [REDACTED] <i>@iconserv.com</i>			

SECONDARY PERSON TO BE CONTACTED ABOUT THIS APPLICATION:			
Name: [REDACTED]		Title: <i>MAINTENANCE MANAGER</i>	
Mailing Address: <i>7152 1st Ave. So.</i>		Telephone: [REDACTED]	
City, State: <i>Seattle, WA</i>		24-Hour Emergency Phone No: [REDACTED]	
Zip Code: <i>98108</i>		FAX No: [REDACTED]	
E-Mail Address: <i>Jim.Funderburg@iconserv.com</i>			

SECTION B - GENERAL BUSINESS INFORMATION

1. NATURE OF BUSINESS

Briefly describe your business and the main activities producing wastewater at the applicant site (type of processing, manufacturing, service, remediation).

Steel drum and Plastic drum RECONDITIONING
Steel drum MANUFACTURING
Intermediate Bulk Container (IBC/Tote) RECONDITIONING

2. PERTINENT IDENTIFICATION NUMBERS AND PERMITS

Standard Industrial Classification (SIC) <u>7199</u>	Environmental Control Permits Issued for Applicant Site: <u>Puget Sound Clean Air Agency</u> <u>Boiler Exempt Motor #42110335</u>
EPA WAD No. <u>WA0000066084</u>	
Water/Sewer Agency <u>Seattle Public Utilities</u> and Account No. <u>01713140-005 7</u>	
Water Meter No(s) <u>V527925 & 57765777</u>	
Current King County Permit No. <u>7130</u>	
Date Business Started at this Site <u>1943</u>	

SECTION C - PRODUCT AND PROCESS DESCRIPTION

1. DAILY AND SEASONAL VARIATIONS

	Number of Operating Days/Year	Circle Days You Generally Discharge and Provide Number of Hours Discharging on Those Days								Number of Employees/Shift		
		Mon	Tues	Wed	Thurs	Fri	Sat	Sun	Holiday	Day	Night	Swing
Average	251	1-3	1-3	1-3	1-3	1-3		0	0	53	N/A	N/A
Maximum	260	6	6	6	6	6	1-3	0	0	60	N/A	N/A

2. BUSINESS ACTIVITIES AND PRODUCTS

Business activities include manufacturing, processing, and remediation activities.

Business Activity	Type of Product or Brand Name	Daily Quantities	
		Average	Maximum
Drum RECONDITIONING	55G L Steel & Plastic	1850	2700
Drum MANUFACTURING	55G L Steel	500	1000
IBC RECONDITIONING	275 gal Totes	5	20

3. RAW MATERIALS AND CHEMICALS USED IN THE PROCESS

Brand Name	Chemical or Actual Name	Purpose	Daily Quantities Used		Tank Volume	Working Concentration
			Average	Maximum		
CAUSTIC SODA BEADS	SODIUM HYDROXIDE	DRUM CLEANING	100 LBS	150 LBS	900 GAL	3%
MURIATIC ACID	HYDROCHLORIC ACID	DRUM CLEANING	22 LBS	30 LBS	250 GAL	32%
SULFURIC ACID	SULFURIC ACID	WASTE WATER TREATMENT	200 LBS	300 LBS	475 GAL	93%
SODIUM NITRITE	SODIUM NITRITE	DRUM CLEANING	24 LBS	26 LBS	100 GAL	1/2%
SODIUM METASILICATE	SODIUM METASILICATE	DRUM CLEANING	35 LBS	37 LBS	100 GAL	1/2%
CAUSTIC SODA	SODIUM HYDROXIDE	WASTE WATER TREATMENT	500 LBS	750 LBS	475 GAL	25%

4. INDUSTRIAL WASTEWATERS DISCHARGED TO KING COUNTY SEWERS

- (1) Enter a brief description and assign a number for each process (add more lines if necessary). Also show these process numbers in Exhibits A and B.
- (2) Indicate frequency of discharge; either continuously discharged when generated, or stored and discharged in batches.

Process Number	Process That Generates Wastewater	Substances Discharged to the Sewer	Type of Pretreatment	Frequency of Discharge (continuous or batch)	Daily Quantity Discharged in Gallons	
					Average	Maximum
1 & 2	CLOSED TOP DRUM RECONDITIONING	FOG	CHEMICAL PRECIPITATION	A	3710	4638
3	NEW DRUM MANUFACTURING	PHOSPHORIC ACID & SODIUM NITRATE	"	A	750	1500
4	IBC (TOTE) RECONDITIONING	BIO DEGRADABLE RINSE	"	A	250	1000
					*	3 OR 4 DAYS PER WEEK
			discontinuously phosphoric acid		**	1 OR 2 DAYS PER WEEK

5. LIQUID WASTES AND SLUDGES REMOVED BY MEANS OTHER THAN KING COUNTY SEWERS

Enter annual, monthly, or daily volume, or volume of each removal. Indicate unit of measurement.

Type of Waste/Substance	Means of Removal	Frequency	Volume
NON-HAZARDOUS DRUM RECONDITIONING RESIDUE	WASTE MANAGEMENT CO.	45-60 DAYS	80 TONS ANNUAL
RECOVERED OIL	THERMAL FLUIDS COMPANY	Weekly	1200 GAL
SHOT BLASTER DUST	INDUSTRIAL SERVICES OR WASTE MANAGEMENT CO.	30-45 DAYS	3 TONS

6. PROPOSED DURATION OF DISCHARGE: INDEFINITE

SECTION D – WATER BALANCE

1. WATER BALANCE TABLE

- (1) Enter the appropriate letter for the water source:
 a.) City Service b.) Private Well c.) Reclaimed Water
 d.) Raw Materials e.) Industrial Storm Water f.) Groundwater
- (2) Enter the appropriate letter for the discharge point:
 a.) Sewer b.) Storm Drain c.) Receiving Water d.) Waste Hauler e.) Evaporation f.) Product
 If the discharge is entering the sewer, also indicate the side sewer (ss) number, if available.
- (3) You must provide documentation of the water balance calculations provided in this table.
 (See directions for Exhibit I.)

Type of Consumption/Discharge	Water In:			Water Out:		
	Water Use			Water Discharge or Loss		
	Water Source (1)	Average (gals/day)	Maximum (gals/day)	Discharge Point (2)	Average (gals/day)	Maximum (gals/day)
Industrial processing water/wastewater	A	5386	8274	A	5386	8274
Contact cooling water	N/A	0	0	N/A	0	0
Non-contact cooling water	N/A	0	0	N/A	0	0
Boiler and cooling tower feed/blowdown	A	2496	3120	E	2496	3120
Water incorporated into product	N/A	0	0	N/A	0	0
Sanitary water/wastewater	A	420	420	A	420	420
Industrial storm water	E	1542	3084	A	1542	3084
Plant washing water/wastewater	E	1000	1200	A	1000	1200
Construction dewatering	N/A	0	0	N/A	0	0
Groundwater remediation	N/A	0	0	N/A	0	0
Site Irrigation	N/A	0	0	N/A	0	0
Evaporation	—	—	—			
Other: (please indicate)						
TOTALS:	—	10,844	16,098	—	10,844	16,098

SECTION E – SUPPORTING EXHIBITS

Please see instructions for information on how to complete the following exhibits:

- Exhibit A:** ✓ Schematic Flow Diagram (required)
Exhibit B: ✓ Site Layout (required)
Exhibit C: Planned Changes in Pretreatment or Waste Disposal Practices
Exhibit D: Analytical or Historical Data
Exhibit E: Spill Prevention and Containment Plan
Exhibit F: Tank Capacities and Concentrations
Exhibit G: Hydrogeologic Reports for Groundwater Remediation
Exhibit H: Engineering Report (Required only if you have wastewater pretreatment systems or are intending to install such systems.)
Exhibit I: ✓ Documentation of Water Balance Calculations

SECTION F – CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name

Signature

Facility General Manager
Title

MAY 12, 2009
Date

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MAY 13 2009

KING COUNTY
INDUSTRIAL WASTE

This information is available in alternative formats for people with disabilities on request at 206-263-3000 (voice) or 711 (TTY).

2008

Daily Water Balance

Water In

8452 City Water (Daily meter readings - (2) Meters) 3 Year Average
2542 Storm Water (37,053 Sq Ft @ 37.19" Annual Average Rainfall)
10,994 Total Water In

Water Out

420 Gal - Sanitary (3x20 Gal - Office, 44x5 Gal - Plant, 8x5 Gal Drivers)
5536 Gal - Industrial Wash Water
1000 Gal - Plant Wash Down (Storm water and/or Recycled water)
1542 Gal - Storm Water less Washdown (37,053 Sq Ft @ 37.19" Annual Rain)
8498 Gal - Total to POTW

Evaporation

2496 Gal - Boiler (Exempt meter #42110335)

8498 Gals POTW

2496 Gals Evaporation

10,994 Gals Total Water Out

2 in rain -

37,053 ft²

= max 41,574 gal

~~10,994~~

1/2

5/5/09

Average Water Usage

Year	(City Water) Combined Total (Two Meters)	Exempt Meter (Boiler)	Actual Discharge (City Water)
2006	2,231,468	759,454	1,472,054
2007	2,349,934	644,548	1,705,383
2008	2,011,107	543,284	1,467,823
	6,592,529	1,947,286	4,645,260
	2,197,510 Avg	649,089 Avg	1,548,420 Avg

$$8452 \text{ Avg Gal/Day} \\ 260 \overline{) 2,197,510}$$

$$2496 \text{ (Boiler)} \\ 260 \overline{) 649,089}$$

$$\begin{array}{r} 8452 \text{ City Water In} \\ 2542 \text{ Storm Water In} \\ 10,994 \text{ Total Water In} \\ - 2496 \text{ Boiler Exemption (Evaporated)} \\ \hline 8,498 \text{ Daily Total discharged to POTW} \end{array}$$

5/4/09

2008 Water Usage

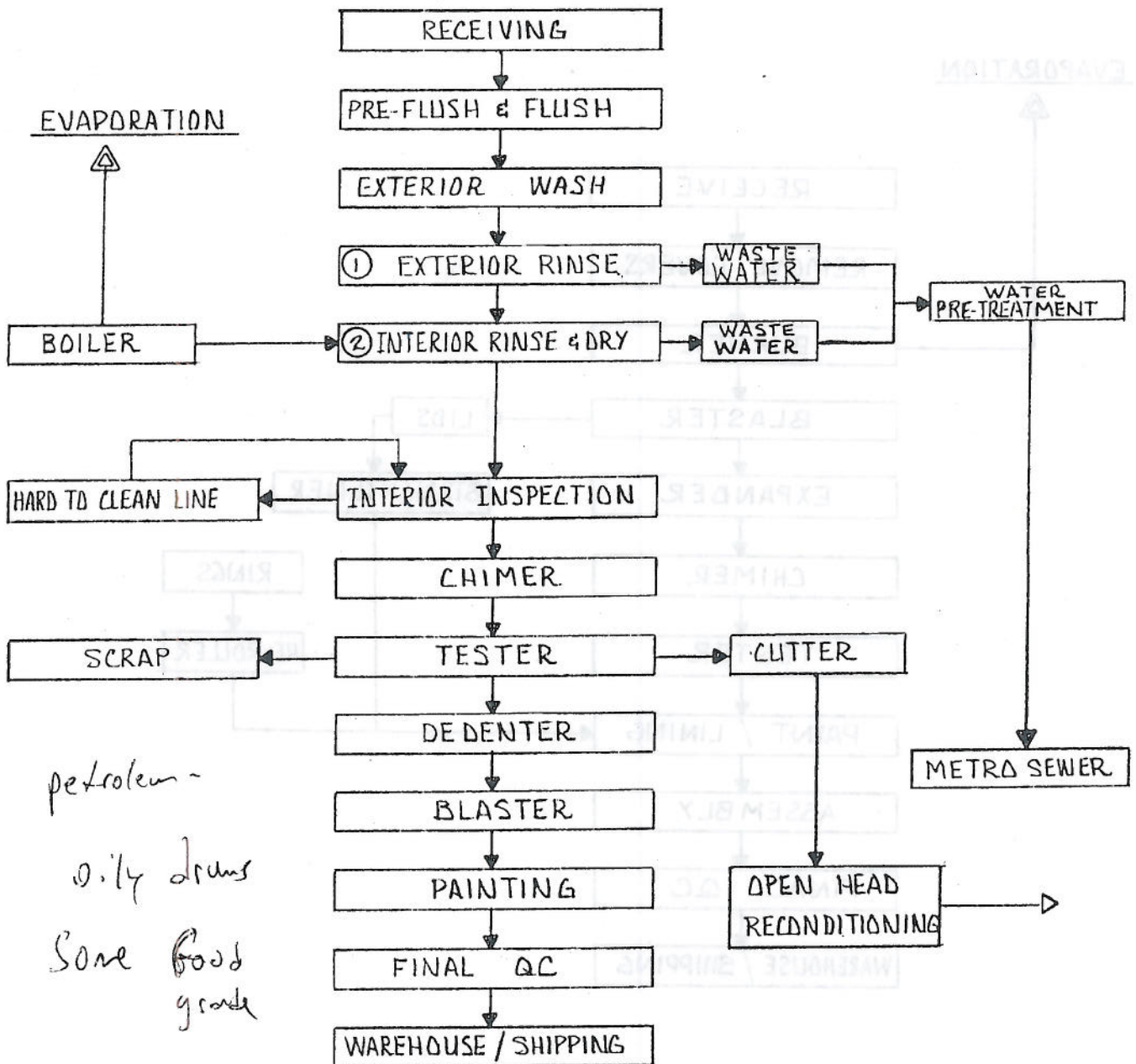
	Comanche Total Two Meters	Enchant Meter Boiler	Actual Discharge Total
Jan	194,758	60,819	132,939
Feb	157,519	41,361	116,158
Mar	160,170	38,824	121,346
Apr	142,243	42,441	106,802
May	148,191	43,600	104,593
Jun	163,636	47,704	115,932
Jul	184,004	45,963	138,041
Aug	194,778	48,234	146,544
Sep	193,227	44,540	148,687
Oct	212,983	49,233	163,750
Nov	137,157	39,413	97,744
Dec	115,441	41,144	74,297
	2,011,107	543,284	1,467,823

2007 Winter Usage

Total (2) Meters		Exempt Meter (Boiler)	Actual Discharge Total
Jan	196,902	73,981	122,921
Feb	193,387	70,682	122,705
Mar	227,118	62,650	164,468
Apr	154,941	46,957	107,984
May	202,127	54,910	147,217
Jun	171,442	50,087	121,355
Jul	169,689	49,527	120,162
Aug	255,796	57,004	198,792
Sep	210,197	45,881	164,316
Oct	225,258	50,677	174,581
Nov	176,631	46,029	130,602
Dec	166,446	36,163	130,283
	<u>2,349,934</u>	<u>644,510</u>	<u>1,705,383</u>

2001 White License

	Total (#) Motors	Exempt Motors	Actual Disposition
Jan	150,657	53,075	100,582
FEB	148,548	55,017	93,531
MAR	203,295	70,050	133,245
APR	162,289	50,559	111,730
MAY	188,385	65,732	122,453
Jun	177,479	70,679	106,800
JUL	212,015	79,470	132,545
AUG	282,418	83,508	198,910
SEP	182,357	57,764	124,593
Oct	176,965	53,732	123,233
Nov	172,550	65,891	106,659
Dec	<u>174,530</u>	<u>56,757</u>	<u>117,773</u>
	2,231,488	759,434	1,472,054

TIGHT HEAD RECONDITIONING PRODUCTION

petroleum -

oily drums

Some food grade

1 - Freon/oil

1 - methylated
crystalline

① ② A PROCESS THAT GENERATES WASTE WATER

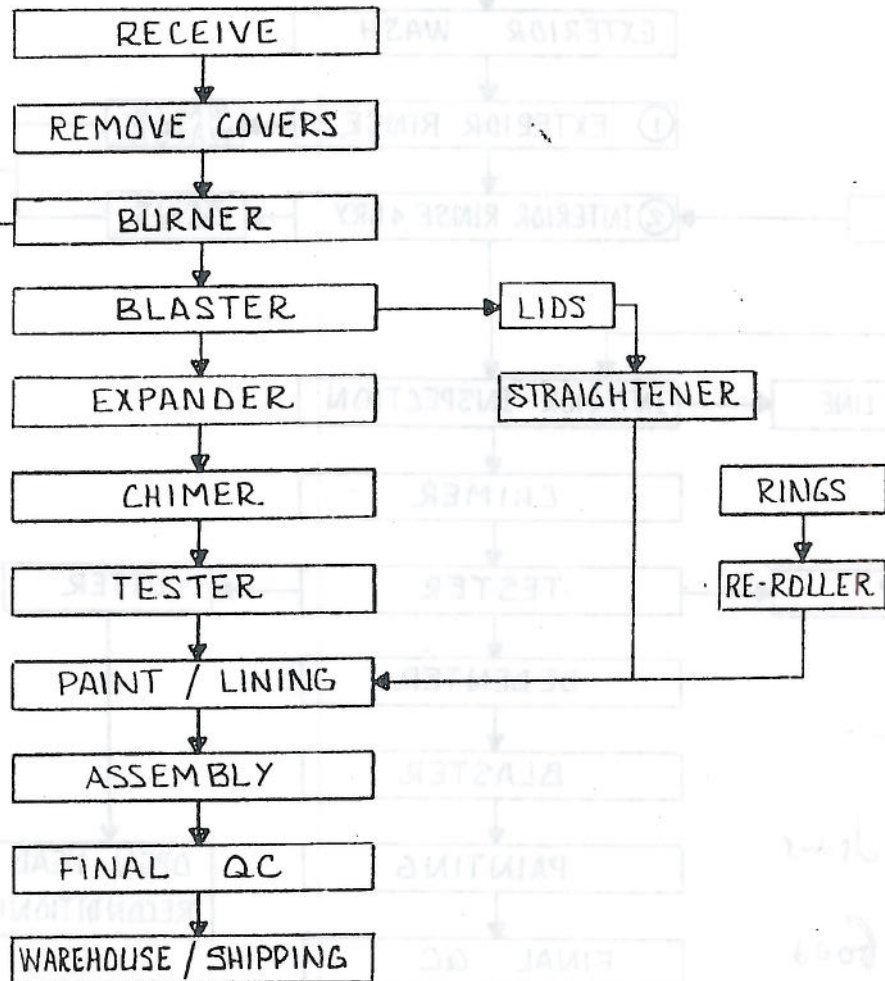
A-methylstyrene

Acetone

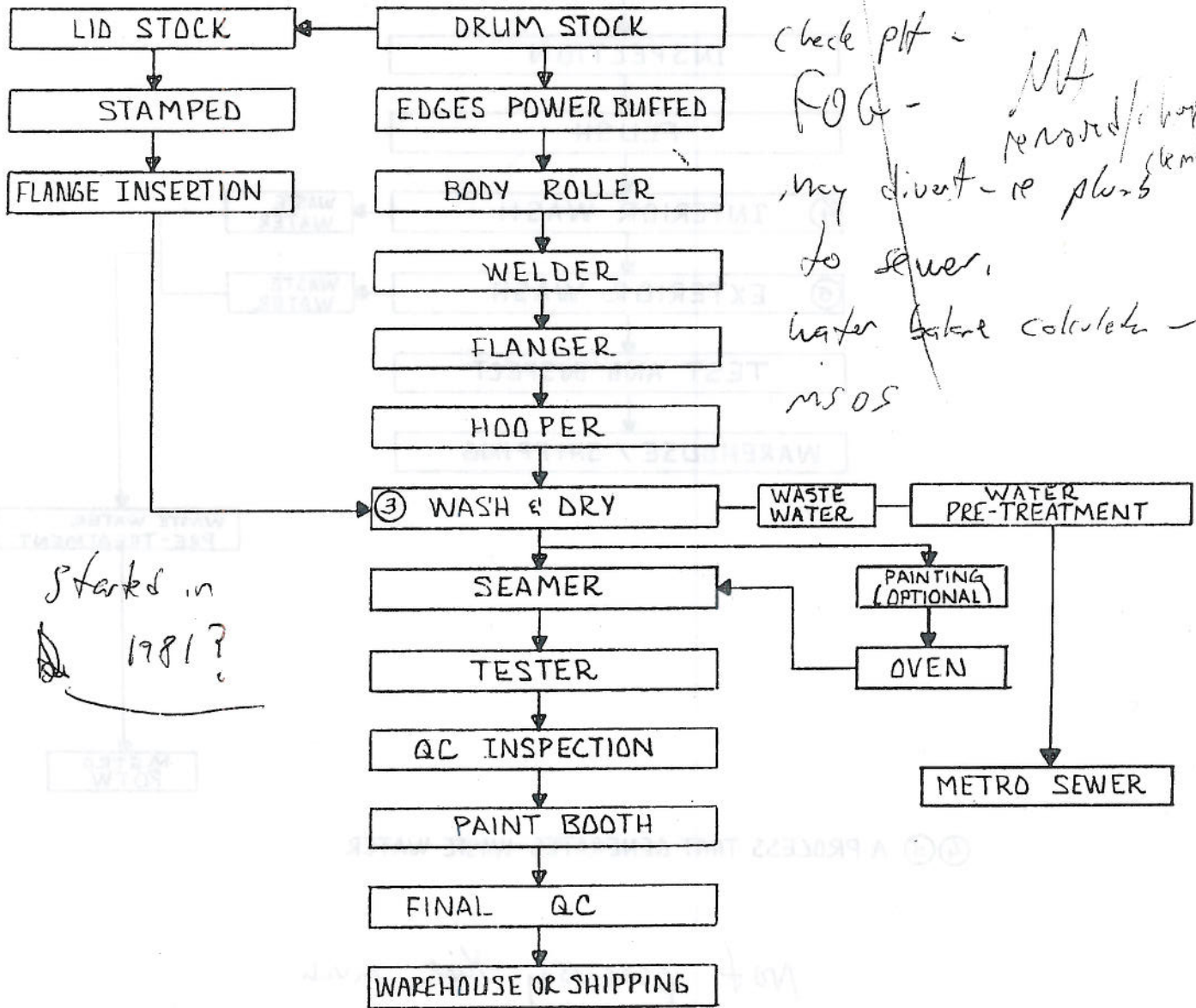
propagol normal

OPEN-HEAD RECONDITIONING PRODUCTION

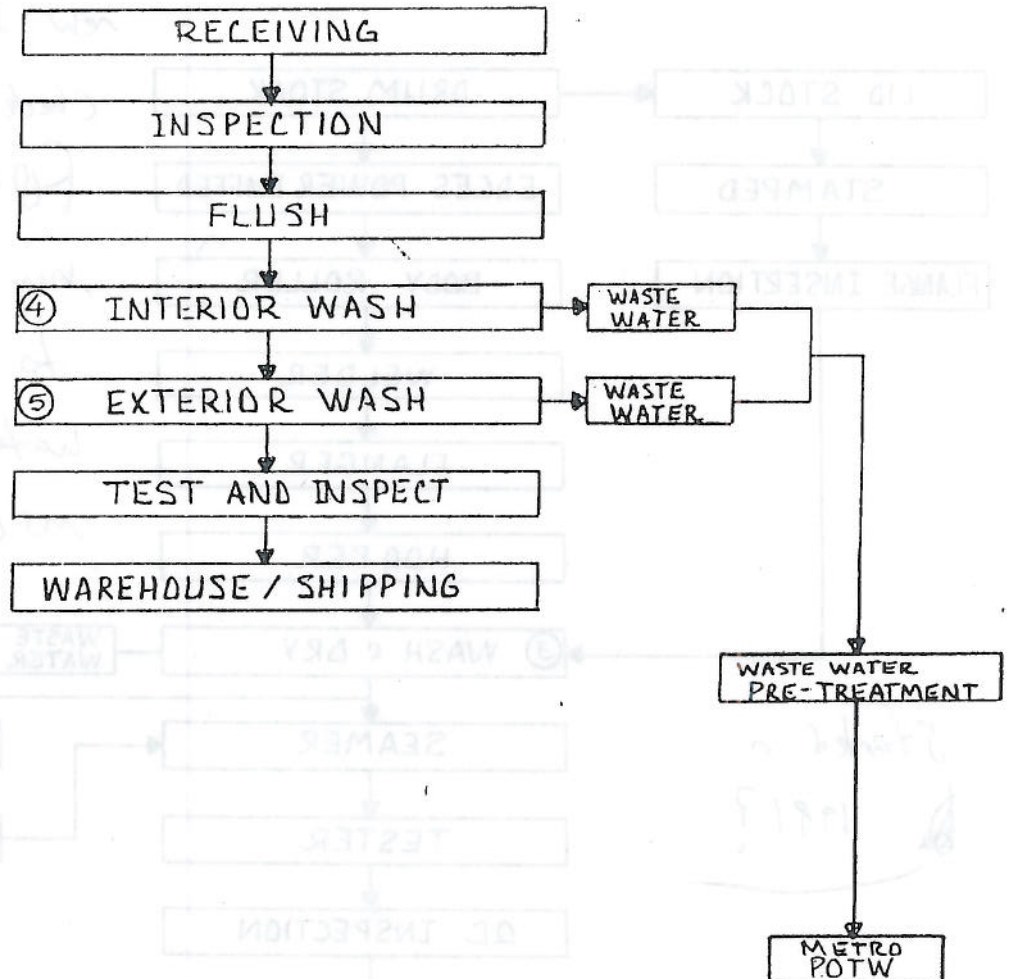
EVAPORATION



NEW DRUM PRODUCTION

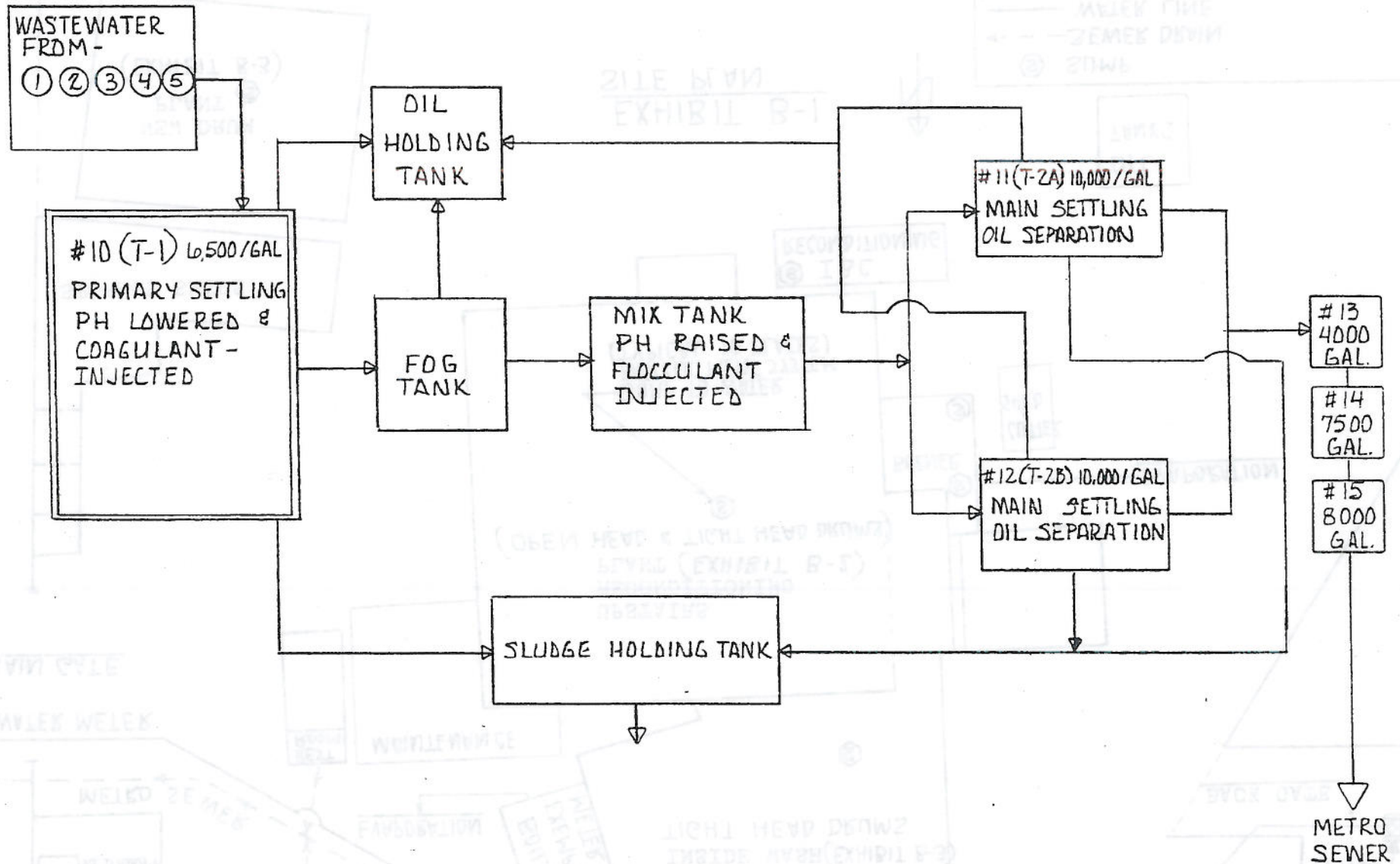


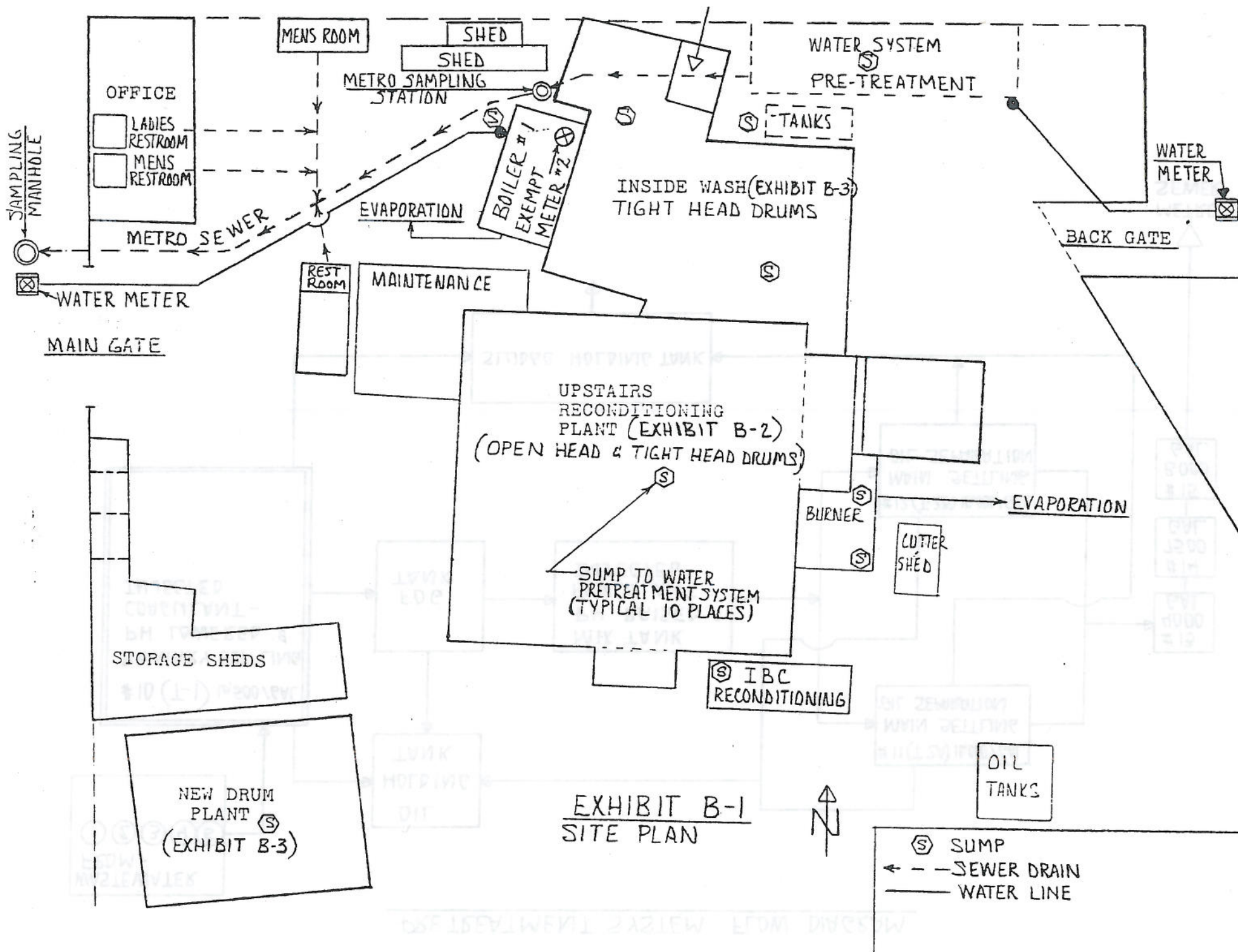
(3) A PROCESS THAT GENERATES WASTE WATER.

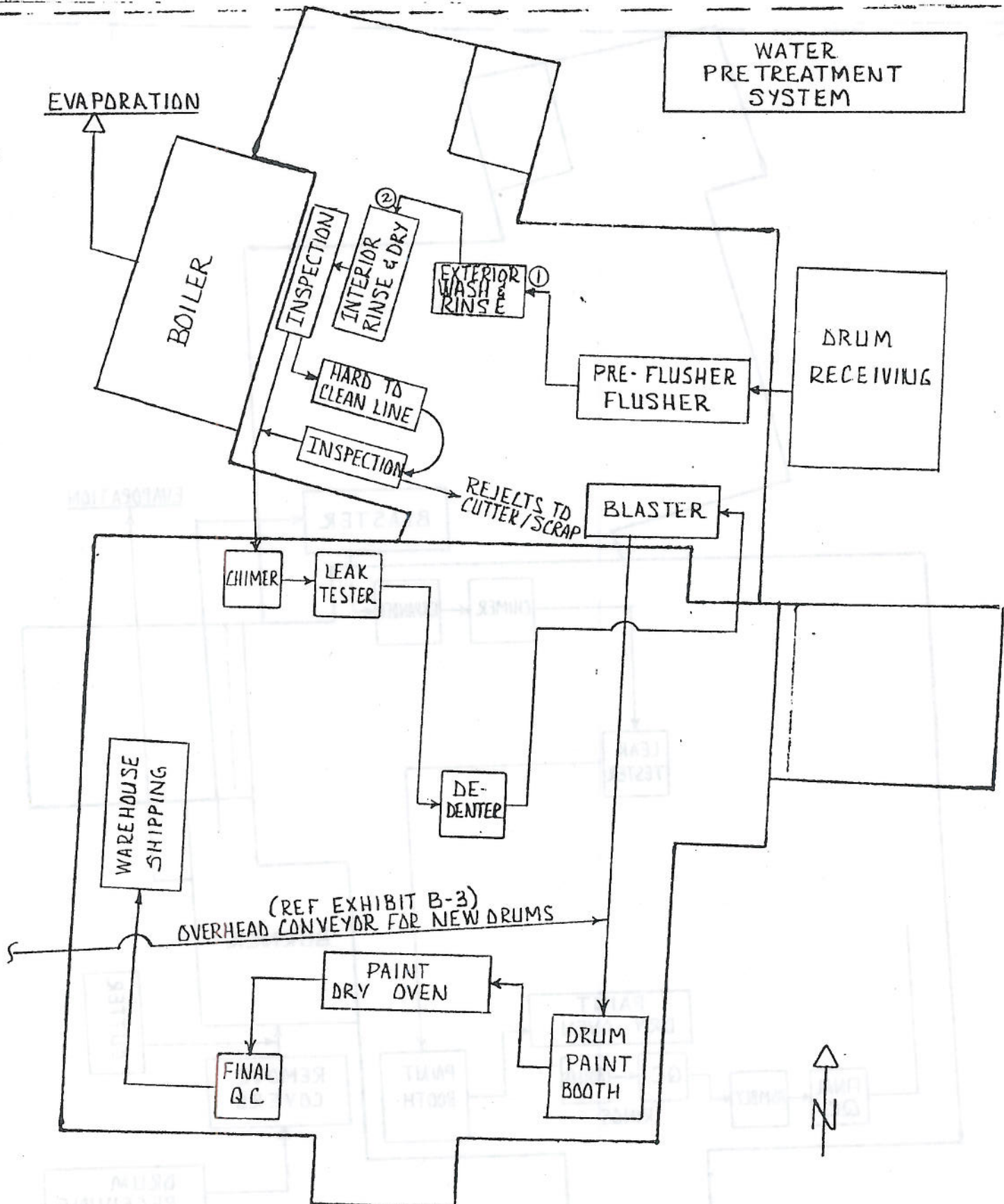
IBC (TOTE) RECONDITIONING PRODUCTION

④⑤ A PROCESS THAT GENERATES WASTE WATER

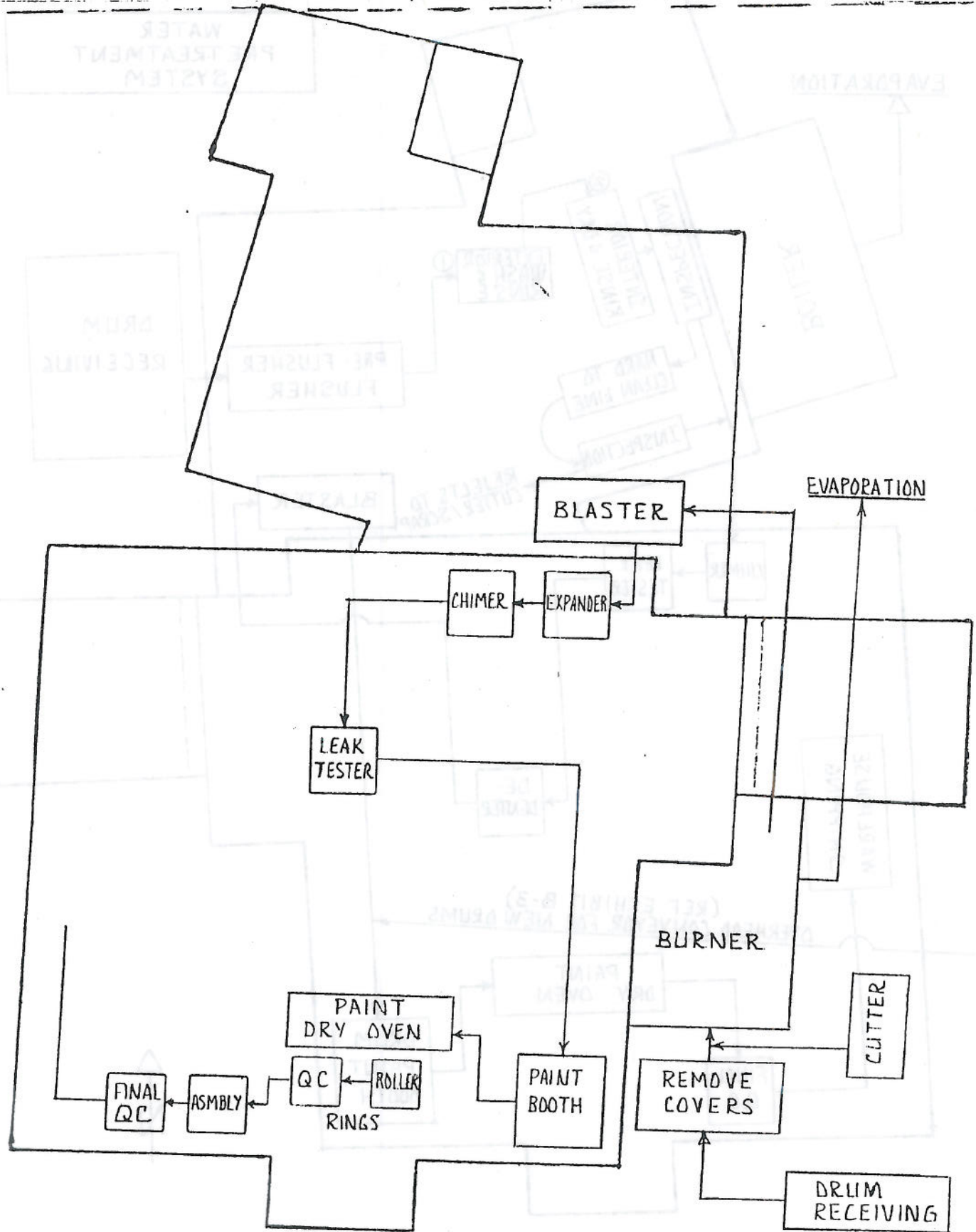
not processing there much.
 It has been 4-5 months since they have,
 they go to another company - meyers

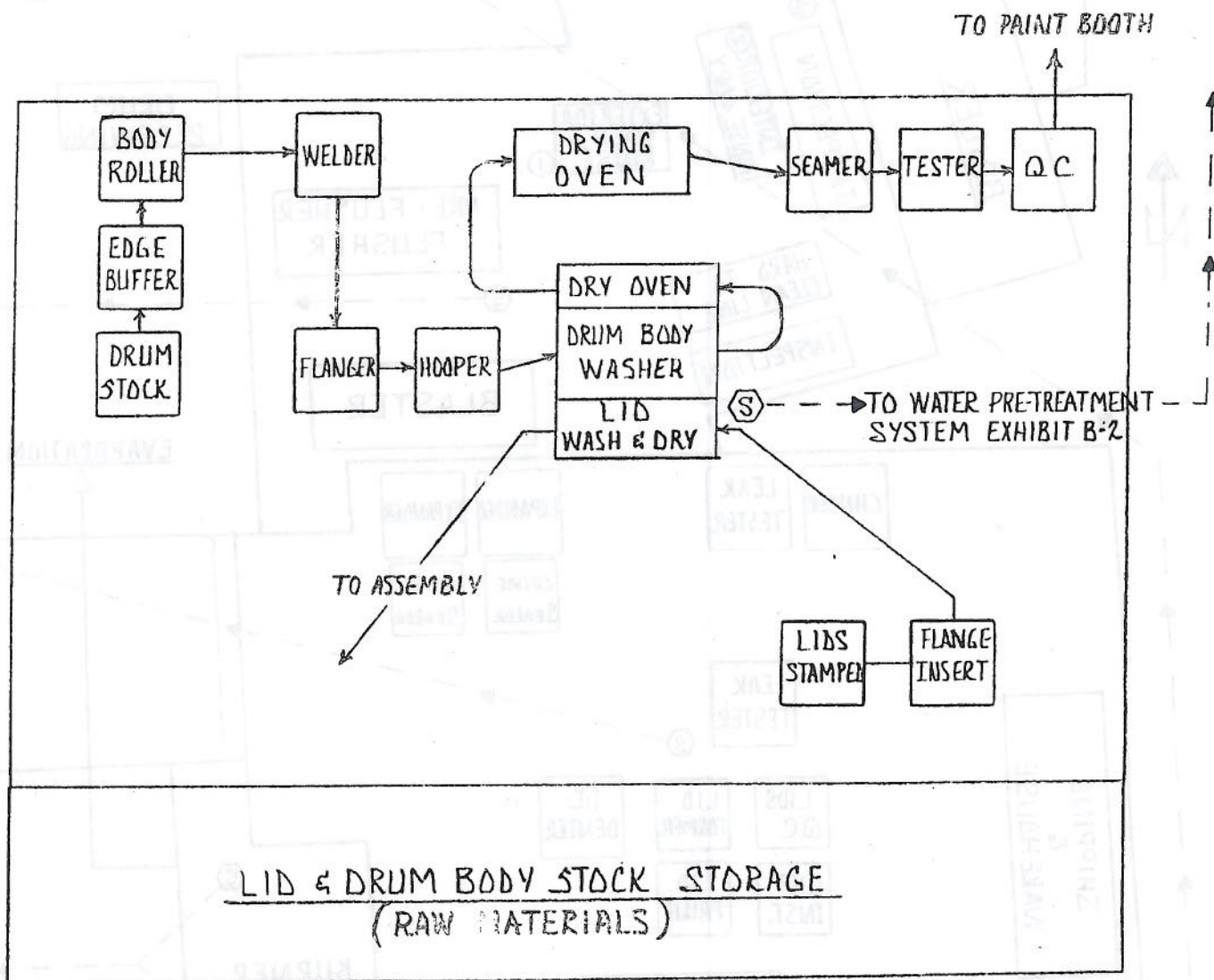
PRETREATMENT SYSTEM FLOW DIAGRAM



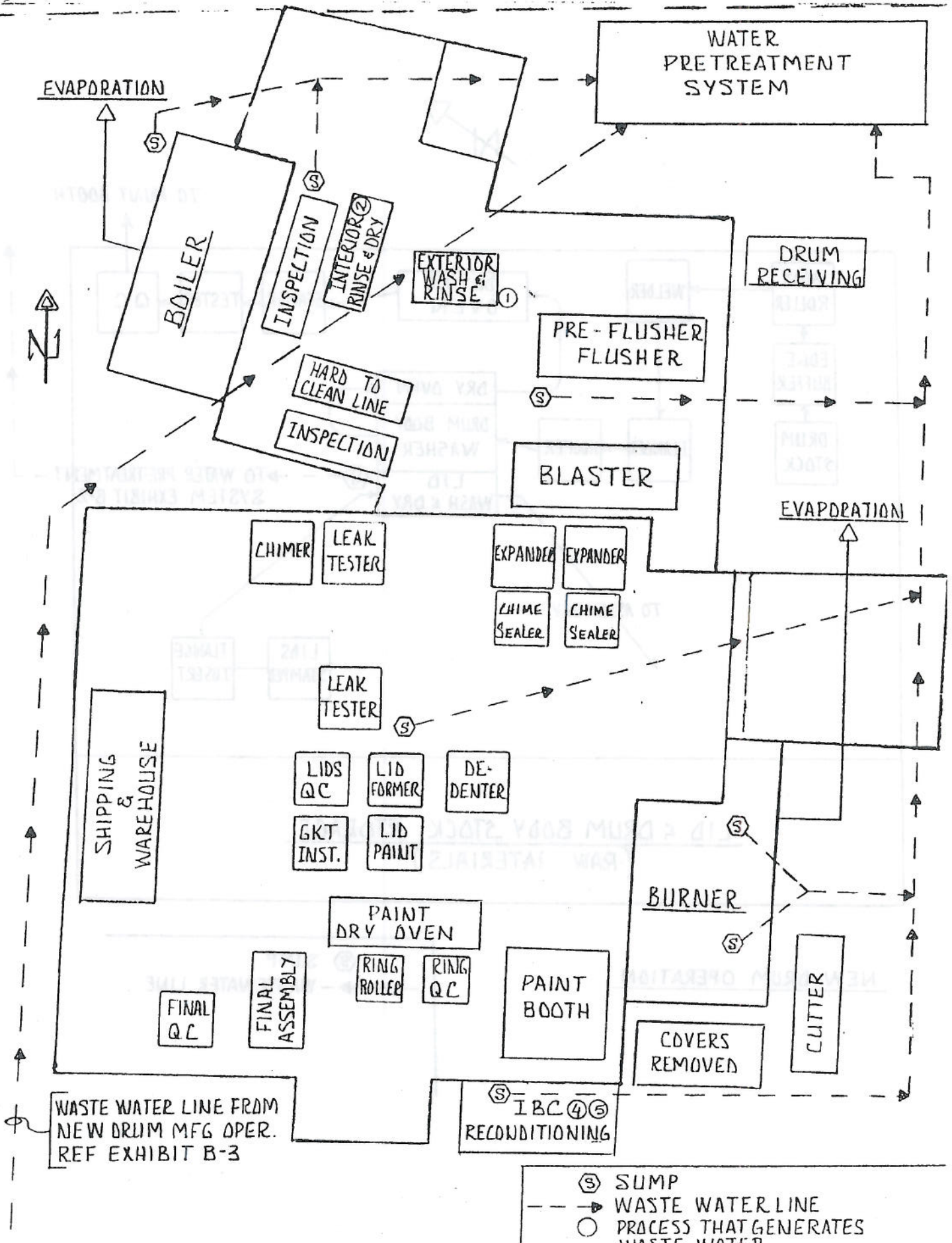


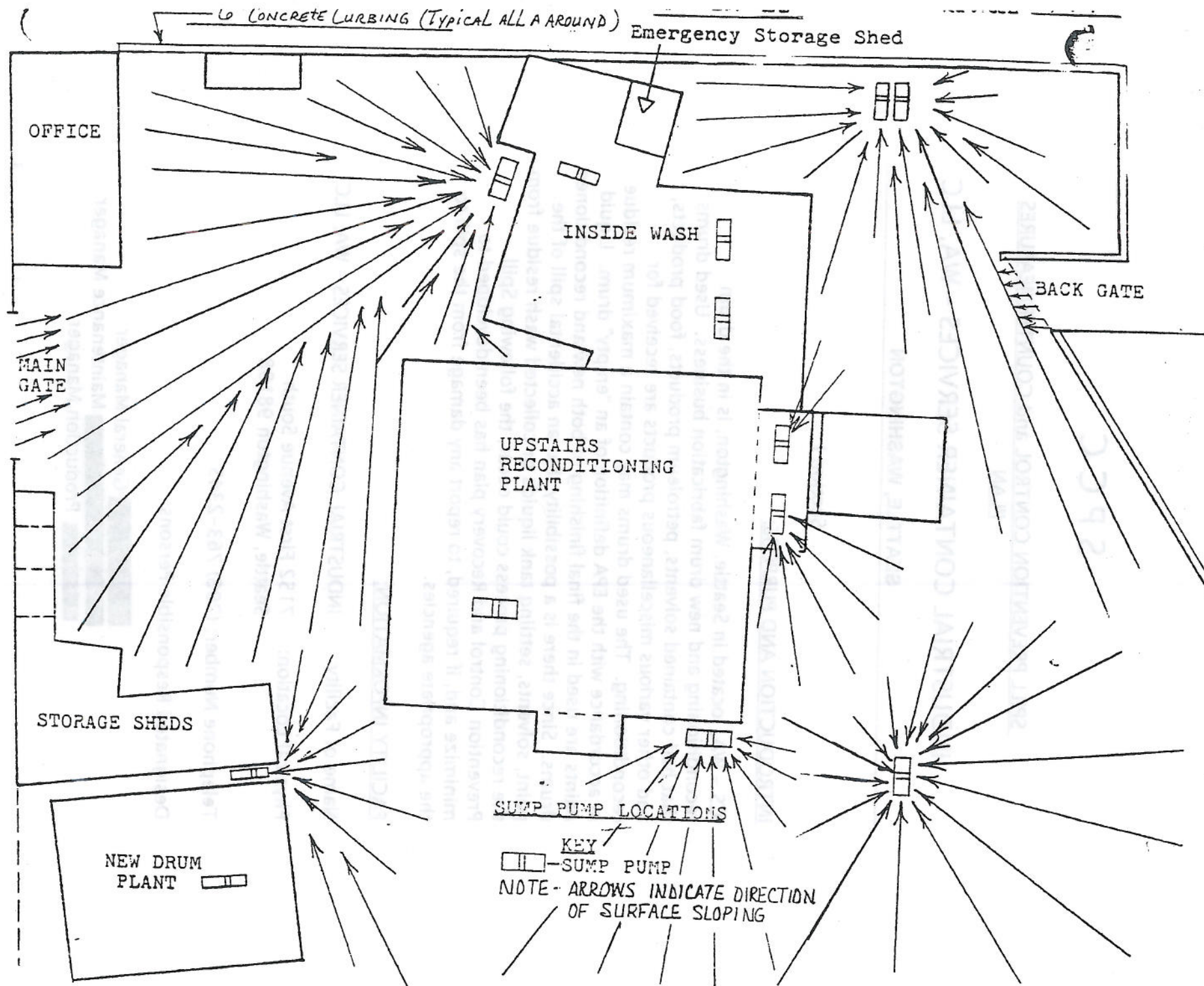
OPEN-HEAD RECONDITIONING OPERATION EXHIBIT B-3



NEW DRUM OPERATION

Ⓢ SUMP
--> WASTEWATER LINE





SPCC

SPILL PREVENTION CONTROL and COUNTERMEASURES PLAN

INDUSTRIAL CONTAINER SERVICES - WA, LLC SEATTLE, WASHINGTON

Section I

INTRODUCTION AND PURPOSE:

ICS - WA, located in Seattle, Washington, is in the drum reconditioning and new drum fabrication business. Used drums that had contained solvents, petroleum products, food products, and other various miscellaneous products are received for reconditioning. The used drums may contain a maximum residue in accordance with the EPA definition of an "empty" drum. Liquid paints are used in the final finishing of both new and reconditioned drums. Since there is a possibility that an accidental spill of the paint, solvents, settling tank liquids or collected wash residue from the reconditioning process could occur, the following Spill Prevention Control and Recovery plan has been developed to minimize and, if required, to report any damage from the spill to the appropriate agencies.

FACILITY INFORMATION:

Name of Facility: INDUSTRIAL CONTAINER SERVICES - WA, LLC

Physical Location: 7152 First Avenue South
Seattle, Washington 98108

Telephone Number: (206) 763-2345

Designated Responsible Persons:

██████████ General Manager
██████████ Maintenance Manager
██████████ Production Manager

COMPANY ENVIRONMENTAL POLICY and WASTE MINIMIZATION PROGRAM

Every effort is being made to comply with Federal, State and Local environmental regulations to "identify" and "minimize" adverse environmental impact of company operations. This effort includes a policy statement in that ICS - WA will not accept drums for reconditioning which have contained "acutely hazardous" materials listed in EPA publication 40 CFR 261.33(e).

- (1) Location of spill;
- (2) Date and time of spill;
- (3) Chemical involved in spill;
- (4) Corrective actions and recovery measures taken;
- (5) Cause of spill.

Chemical spills shall be immediately reported to the General Manager. If at that time it is determined that the spill threatens public health or the environment, regardless of quantity, (see Section VII, Personal Training regarding reportable quantities, page 13), required notification to appropriate authorities (see Appendix B: Emergency Phone Numbers, Page 20) and the DOE will be made immediately by a trained spill coordinator. These coordinators are:

DAY SHIFT: [Redacted] General Manager
[Redacted] Maintenance Manager

OVERTIME SHIFT: [Redacted] Production Manager

Section II

SPILL EVENTS:

"Spill Event" shall mean a release of potentially harmful chemical material from ICS – WA, located in Seattle, Washington.

For each spill event, the Production Supervisor shall maintain a record of the spill event providing the following detail:

- (1) Location of spill;
- (2) Date and time of spill;
- (3) Chemical involved in spill;
- (4) Corrective actions and recovery measures taken;
- (5) Cause of spill.

Chemical spills shall be immediately reported to [REDACTED] the General Manager. If at that time it is determined that the spill threatens public health or the environment, regardless of quantity, (see Section VII, Personal Training regarding reportable quantities, page 13), required notification to appropriate authorities (see Appendix B: Emergency Phone Numbers, Page 20) and the DOE will be made immediately by a trained spill coordinator. These coordinators are:

DAY SHIFT:

[REDACTED] General Manager
[REDACTED] Maintenance Manager

OVERTIME SHIFT:

[REDACTED], Production Manager

Section III

An example of the spill event form follows:

SPILL EVENT RECORD

INDUSTRIAL CONTAINER SERVICES - WA, LLC
7152 First Avenue South
Seattle, Washington 98108
(206) 763-2345

LOCATION: _____

AMOUNT OF SPILL _____

Contact Person: _____

Date/Time: _____

Chemicals Involved: _____

Cause of Spill: _____

Corrective Action Taken: _____

Section IV

Potential Spill Sources:

The following is a list of potential spill sources, the type of failure which would cause a spill, the maximum volume involved for each failure, and the most probable flow direction of the spill.

Each individual potential spill source and recovery action is explained in detail in Section V. Tank locations, listed below, are identified in Section X.

<u>Source</u>	<u>Type of Failure</u>	<u>Volume</u>	<u>Flow Direction</u>
(1) Sulfuric Acid Tank	Container Failure or Overflow	475 gallons	Over concrete surface to sumps
(2) Caustic Tank	Container Failure or Overflow	475 gallons	Over concrete surface to sumps
(3) Water Holding Tank	Container Failure or Overflow	6500 gallons	Over concrete surface to sumps
(4) Water Holding Tank	Container Failure or Overflow	500 gallons	Over concrete surface to sumps
(5) Metro Water System Tank	Container Failure or Overflow	500 gallons	Over concrete surface to sumps
(6) Transfer Tank	Container Failure or Overflow	4000 gallons	Over concrete surface to sumps
(7) Metro Water System Tank	Container Failure or Overflow	10000 gallons	Over concrete surface to sumps
(8) Metro Water System Tank	Container Failure or Overflow	10000 gallons	Over concrete surface to sumps
(9) Metro Water System Tank	Container Failure or Overflow	4000 gallons	Over concrete surface to sumps
(10) Water/Oil Separator	Container Failure or Overflow	3000 gallons	Over concrete surface to sumps

<u>Source</u>	<u>Type of Failure</u>	<u>Volume</u>	<u>Flow Direction</u>
(11) Metro Water System Tank	Container Failure or Overflow	7500 gallons	Over concrete surface to sumps
(12) Metro System Water Tank	Container Failure or Overflow	8000 gallons	Over concrete surface to sumps
(13) Hydrochloric Acid Tank	Container Failure or Overflow	250 gallons	Over concrete surface to sumps
(14) Pre-Flush Tank	Container Failure or Overflow	1000 gallons	Over concrete surface to sumps
(15) Flush Tank	Container Failure or Overflow	1000 gallons	Over concrete surface to sumps
(16) Power Washer Tank	Container Failure or Overflow	2500 gallons	Over concrete surface to sumps
(17) Inside Rinse Tank	Container Failure or Overflow	2400 gallons	Over concrete surface to sumps
(18)	Acid Work tank	250 gallons	
(19) Neutralizer tank		300 gallons	
(20) Diesel Storage	Container Failure or Overflow	1000 gallons	Over concrete surface to sumps
(21) T.H. Tester	Container Failure or Overflow	1000 gallons	Over concrete surface to sumps
(22) OH Tester Tank	Container Failure or Overflow	550 gallons	Over concrete surface to sumps
(23) Paint Tank	Container Failure or Overflow	20 gallons	Over concrete surface to sumps
(24) Paint Storage Area	Spillage from Drums	Limited volume	Concrete floor
(25) Not in Service	Container Failure or Overflow	8000 gallons	Over concrete surface
(26) Not in Service	Container Failure or Overflow	8000 gallons	Over concrete surface

<u>Source</u>	<u>Type of Failure</u>	<u>Volume</u>	<u>Flow Direction</u>
(27) Propane tanks			
(28) Propane tanks			
(29) Wash & Rinse Tanks	Spillage on Floor	2000 gallons	Over concrete surface to sumps
(30) Diesel Storage Tank	Container Failure or Overflow	2000 gallons	Over concrete surface to sumps
(31) Lubricating Oil Drums	Drum Failure	55 gallons	Over concrete surface to sumps

Section V

Spill Contingency Plan and Reporting

General Discussion Applicable to Industrial Container Services - WA, LLC. Seattle, Washington, Facility:

In the facility area where most of the tanks are situated ("The Tank Farm") there is a primary and secondary sump pump system that is designed to pump floor and rain drainage into the Water and Oil Settling Tanks as part of normal facility operation. The Settling Tanks have normal sufficient capacity to handle all considered spill failures of individual tanks in the Tank Farm. The redundant electric-driven sump pump system is also backed up by an independent propane energy pump which will pump excess sump liquid into a 500 gallon reserve settling tank. This propane pump provides back-up capacity in the event of total facility electrical power failure or primary and secondary sump pump failure.

The entire area beneath all tanks is hard surfaced concrete that provides an impervious surface and controlled drainage direction to any spill. Curbing is provided on the north side of the property to prevent any tank spillage from flowing off of the ICS - WA property. The sloping shape of the concrete surface is also toward the low spot of the concrete where the entry to the sump pumps is located. This facility configuration was designed such that any spillage is naturally contained within the hard surface and directed toward the sump pump opening and thus into tank containers.

The spill corrective action required by assigned personnel is to inspect the sump pumps to be sure they are operating properly. Those personnel who will do the inspection must wear proper protective clothing, boots and gloves.

SPILL CONTINGENCY PLAN AND REPORTING:

CATEGORY A:

The above discussion is applicable to specific spill sources noted in Section IV above and listed as follows:

Source Tanks: 3, 4, 5, 6, 7, 8, 8A, 8B, 9, 10, 11, 12,
16, 17, 19, 21, 22, 25, 26, 29

Materials which are spilled from these sources are normal drum reconditioning liquids which the tank and plumbing of the ICS – WA facility is designed to handle.

Spill Counter-measures for tanks in Category A shall be as follows:

- A1. Check to be sure proper boots, gloves and clothing are being worn before entering the spill area.
- A2. Check the normal electric sump pump and propane pump to determine if they are operating properly.
- A3. Determine which tank is the source of the spill and valve off the offending tank to prevent any additional fluid from entering into it.
- A4. Squeegee the general area of the spill toward the sump pump and apply Solusorb™ or Plug N' Dike™ to dam the spill if it threatens to spill off the concrete area. Use Plug N' Dike to temporarily seal the leak in the tank.
- A5. Place used Solusorb™ in an open top DOT 17H type 55 gallon drum (use a non-sparking shovel to pick up this material) and dispose of the drum as appropriate.
- A6. Triple rinse the shovel to remove any residual material as a precautionary measure.

CATEGORY B:

The following tanks contain chemical concentrates that must be neutralized so as to prevent damage to pipes, tanks and other facilities not designed to resist these concentrated acids and caustics. Personnel will need additional personal protection as well as increased caution in dealing with these chemicals. Special training will be given to select individuals who will be assigned responsibility for containing and cleaning up spills originating from tanks holding caustic or acid.

Source tanks containing caustic or acid are noted in Section IV above and are listed as follows:

Source Tanks: 1, 2, 13, 14, 15, 18

Spill countermeasures for tanks in Category B shall be taken as follows:

- B1. Check to be sure proper boots, gloves and protective clothing are being worn before entering the spill area.
- B2. Use proper respirator to avoid breathing fumes that may be present.
- B3. If the spill is from Tank number 2 (caustic) or Tank number 14, flush with water toward the sump. Continue to rinse the area with water and squeegee until all puddling has been eliminated. Seal off any tank leak with Plug N' Dike™.
- B4. If the spill is from Tank number 13 or Tank number 18 (hydrochloric acid) neutralize the spill with caustic. Flush the spill area with water and caustic until testing indicates a minimum PH of 6. Flush the sump pump with a neutralizing caustic solution. Add water and caustic to dilute the solution in the settling tank until testing indicates a maximum PH of 11.5. Seal off leaks with Plug N' Dike™.

CATEGORY C:

The following tanks contain flammable liquids and therefore all personnel should avoid smoking or using equipment that may produce a spark in the area of these tanks. Tanks containing flammable liquids are diked so as to contain any spill from progressing toward other areas of the facility.

Source tanks containing flammable liquids are noted in Section IV above and are listed as follows:

Source tanks: 20, 23, 24, 27, 28, 30, 31.

Spill countermeasures for tanks in this category shall be taken as follows:

- C1. Immediately remove any source of ignition from the spill area.
- C2. Immediately provide maximum ventilation to any enclosed area by opening doors or other obstructions to air circulation.
- C3. Apply Solusorb™ or Plug N' Dike™ onto spilled liquid. If there is any danger of the spill extending beyond the curbed concrete area, apply Solusorb™ or Plug N' Dike™ to the area to form a dam. Transfer of the contents of the leaking tank may be required to minimize the spill.
- C4. Place used Solusorb™ or Plug N' Dike™ in an open head UN 1A2 type 55 gallon drum (use a non-sparking shovel to pick up this material.) Dispose of the drum in an appropriate manner.
- C5. Decontaminate the shovel by rinsing with water three times. Collect rinseate and pour in drum used in C4 above.

Section VI

SECURITY

In the event of an off-hour emergency the Security Guard will notify the Emergency Coordinator or his Alternate. Security is provided by Washington Protective Service and a local alarm and wailing system. A six-foot high cyclone fence topped with barbed wire surrounds the entire facility except for those portions adjacent to the Duwamish River. A gate that is part of this fence is locked during off-hours. Only management personnel have access to the facility during off-hours.

Section VII

PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

Special training sessions dedicated to this plan will be held as deemed necessary for present and future programs. Special training sessions for all emergency coordinators and employees designated to be part of this SPCC plan will be conducted and documented. These training sessions will cover the following outline of information.

- A. Acts and Regulations:
An overview of EPA, DOE, and DOT regulations which pertain to hazardous waste generated at the ICS - WA facility.
- B. Vulnerabilities/Liabilities:
A summary fines and penalties.
- C. Regulatory definitions of hazardous waste.
- D. Identification and listing of hazardous waste to include waste/specific, commercial chemical products.
- E. Naming and designating hazardous waste (49 CFR ss 172.101 - the hazardous materials table with directions for use.)
- F. Generating/Shipping hazardous waste to include generator standards, generator annual report, the reporting system, shipping requirements, shipping papers/manifest, marking, labeling, placarding and "cradle to grave" management.
- G. Emergency response/contingency planning. Federal, State and Department of Transportation guide to incident reporting.

Review of SPCC plan for ICS – WA, Seattle, Washington, facility.
Spill clean-up and sampling information. Spill equipment
decontamination. Reportable quantities.

Records will be kept separate from this plan detailing which
employees received this training at ICS – WA, Seattle, Washington,
facility.

Section VIII

SPCC PLAN AND AMENDMENTS

1. Records will be kept on all non-ICS – WA agencies, departments or emergency services that have received and reviewed this SPCC Plan.

2. Facility Change:

This SPCC plan will be amended within six months after any change in the facilities design, construction, operation or maintenance which would materially affect its potential for chemical spill.

3. This plan will be reviewed at least once every three (3) years. The plan will be amended to include more effective chemical spill prevention and control methods as the need arises. The plan will also be amended to include changes in personnel involved with this plan or environmental regulations. Updates of this plan will be forwarded to the appropriate governmental agencies.


Section IX

MANAGEMENT APPROVAL:

A.  

General Manager

Date: 1/2/09



Maintenance Manager

Date: 1-8-09

Bob Miller 

Production Manager

Date: 1-2-09

Section X

MANAGEMENT APPROVAL:

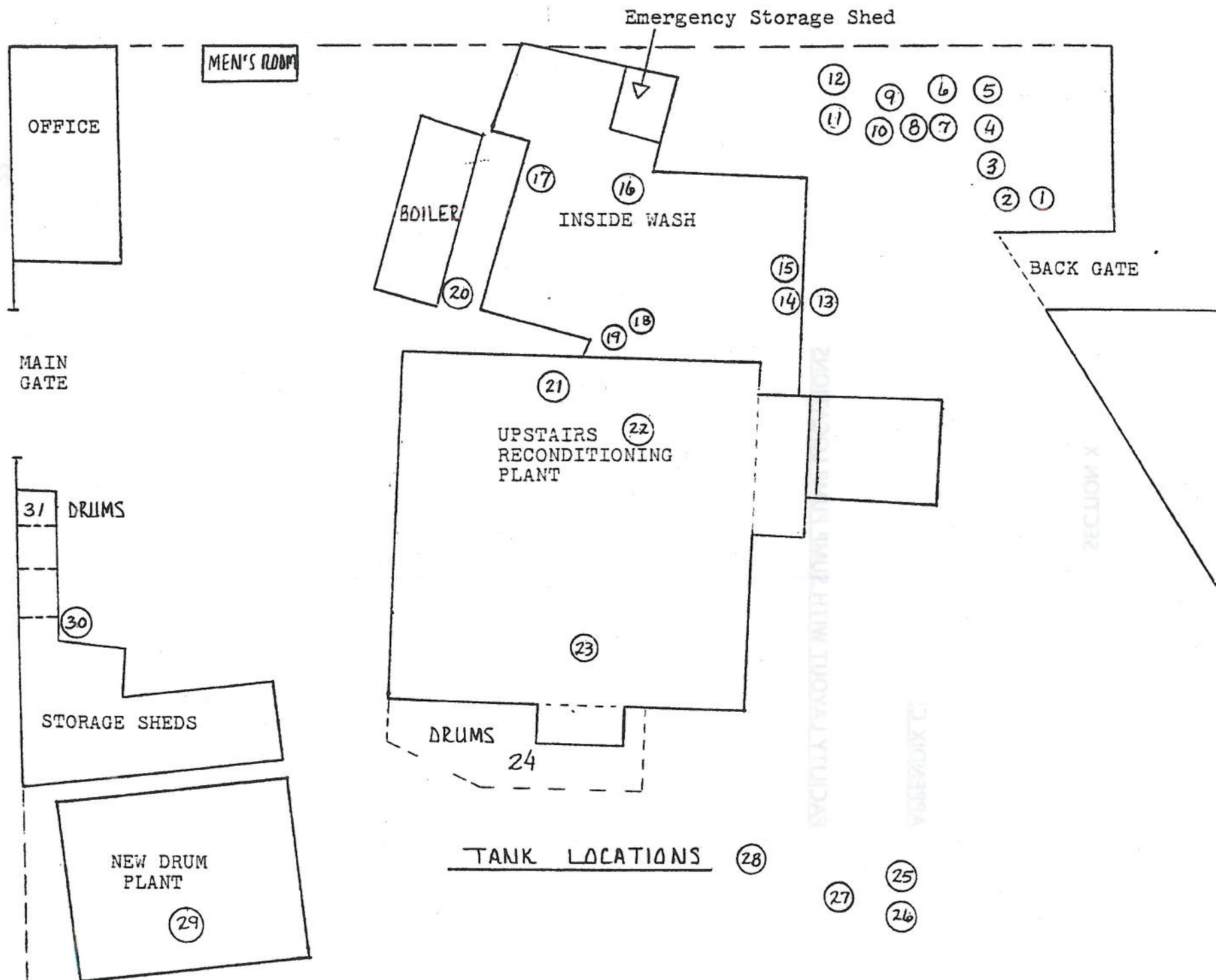
APPENDIX A:

FACILITY LAYOUT WITH TANK LOCATIONS

[Redacted Signature] A. [Redacted]
General Manager
Date: 1/2/09

[Redacted Signature] [Redacted]
Maintenance Manager
Date: 1/2/09

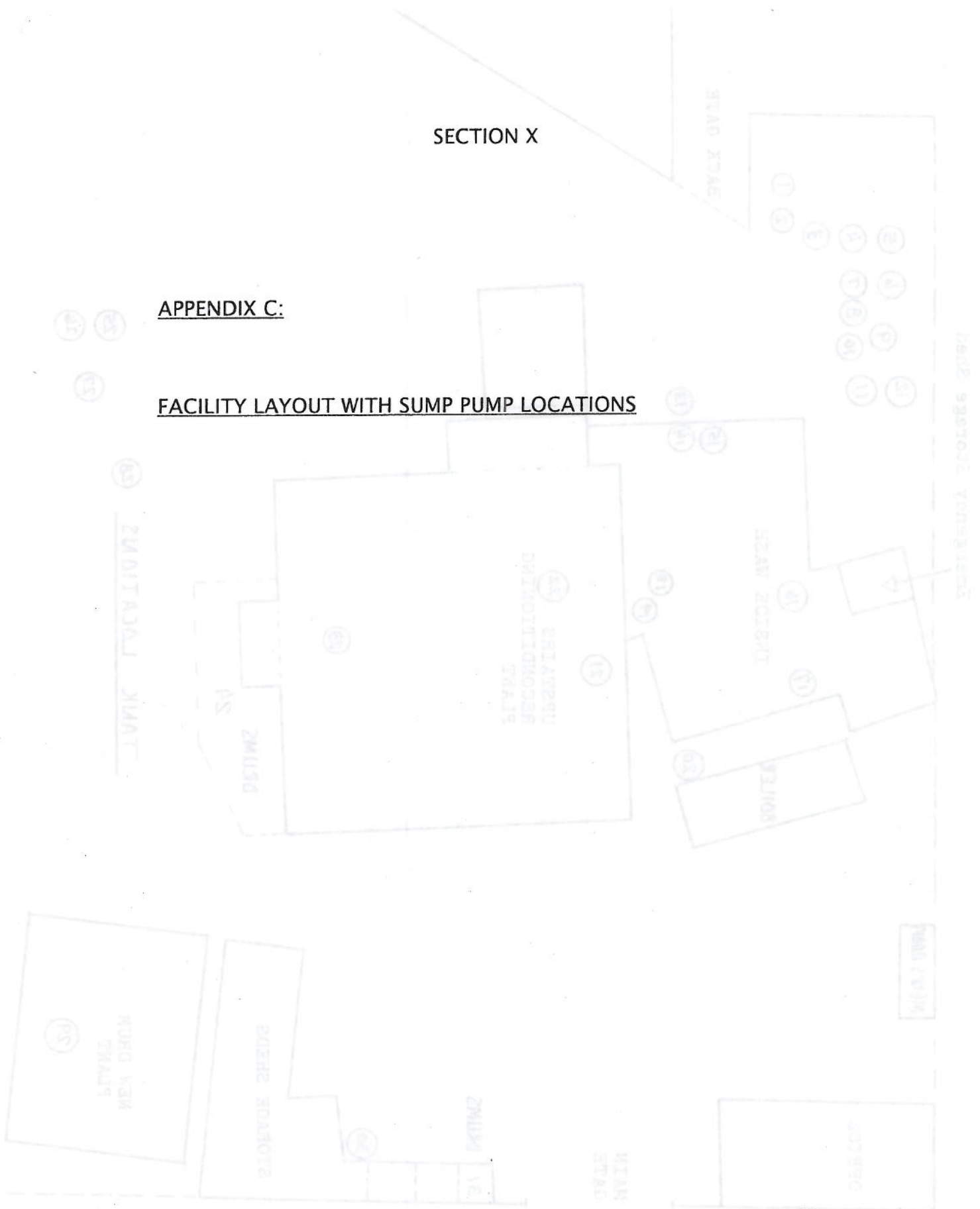
[Redacted Signature] Bob Miller
Production Manager
Date: 1-2-09



SECTION X

APPENDIX C:

FACILITY LAYOUT WITH SUMP PUMP LOCATIONS



Emergency Storage Shed

OFFICE

MAIN GATE

INSIDE WASH

UPSTAIRS RECONDITIONING PLANT

BACK GATE

STORAGE SHEDS

NEW DRUM PLANT

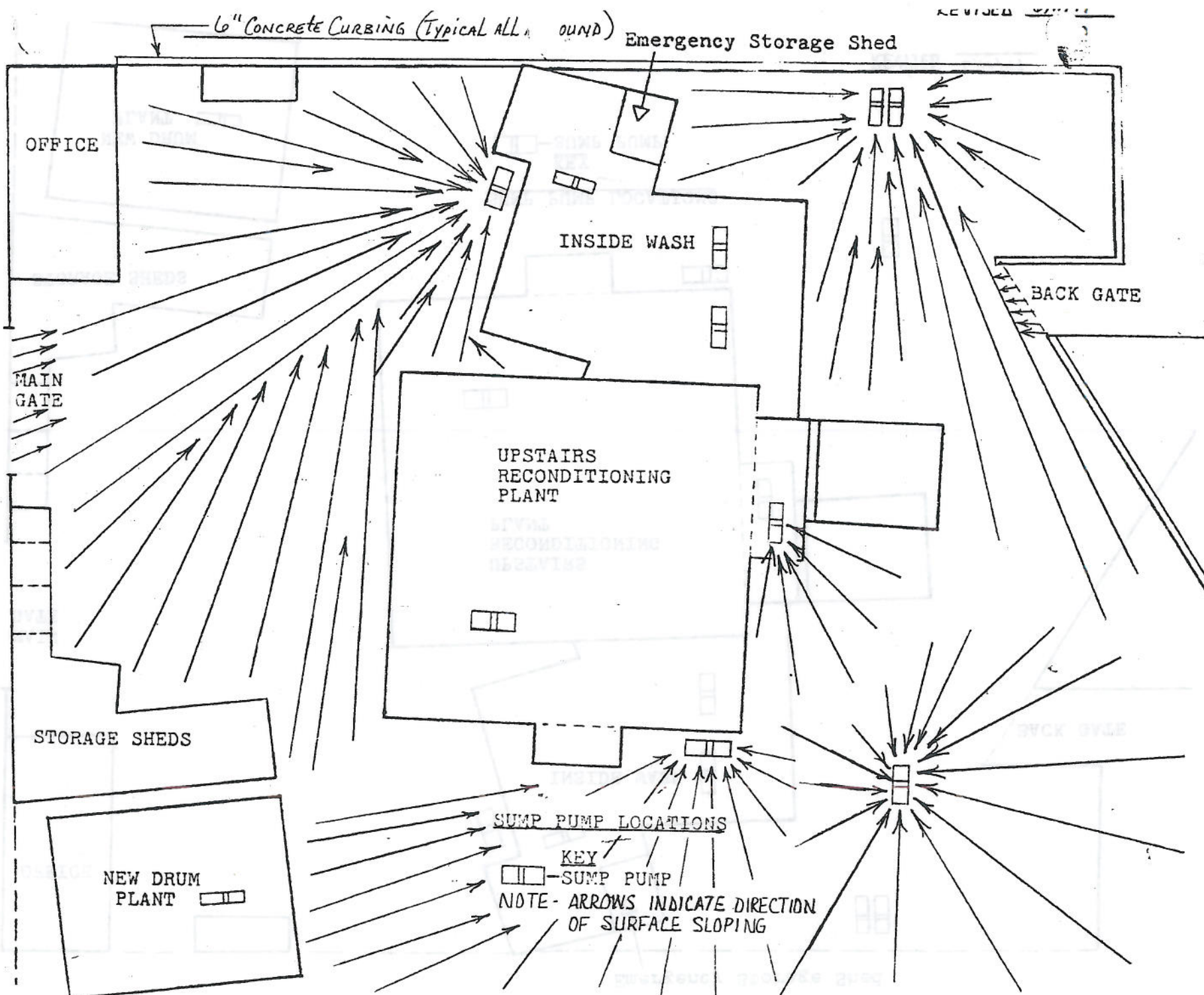
SUMP PUMP LOCATIONS

KEY

—SUMP PUMP

REVISED 6/10/99

REVISED: 6/10/99



SECTION X

APPENDIX D:

CONTINGENCY PLAN



King County

Wastewater Treatment Division Industrial Waste Program

Department of Natural Resources and Parks
130 Nickerson Street, Suite 200
Seattle, WA 98109-1658

206-263-3000 Fax 206-263-3001
TTY Relay: 711

October 1, 2009

CERTIFIED MAIL RETURN RECEIPT REQUESTED

[REDACTED]
Industrial Container Services
7152 First Avenue S.
Seattle, WA 98108

Issuance of Wastewater Discharge Permit No. 7130-04 to Industrial Container Services by the King County Department of Natural Resources and Parks

Dear [REDACTED]

Your application for issuance of a discharge permit has been reviewed and processed in accordance with Chapter 90.48 RCW as Amended, Public Law 92-500, and King County Code 28.84.060.

The enclosed issued Permit No. 7130-04 covers the wastewater discharge from the Industrial Container Services operation located at 7152 First Avenue South, Seattle, Washington. All discharges from this facility, and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit. The enclosed Permit No. 7130-04 supersedes and cancels Permit No. 7130-03 effective October 3, 2009.

If you have any questions, please call [REDACTED]

Sincerely,

[REDACTED]
[REDACTED]
Program Manager
Industrial Waste Program

Enclosures

cc: [REDACTED], Department of Ecology
[REDACTED], Seattle Public Utilities
[REDACTED], King County

Permit No.: 7130-03
Issuance Date: October 1, 2009
Effective Date: October 3, 2009
Expiration Date: October 2, 2014



King County

WASTE DISCHARGE PERMIT

Department of Natural Resources and Parks
Industrial Waste Program
130 Nickerson Street, Suite 200
Seattle, Washington 98109-1658

In accordance with the provisions of Chapter 90.48 RCW as amended,
Public Law 92-500, and King County Code 28.84.060,
a Waste Discharge Permit is issued to:

Industrial Container Services

Plant Location: 7152 First Avenue S.
Seattle, WA 98108

Business Hours Phone: 206-763-2345

Emergency (24-Hour) Phone: 206-723-6609

Mailing Address: 7152 First Avenue S.
Seattle, WA 98108

Permission is hereby granted to discharge industrial wastewater from the above-identified facility into the King County sewerage system in accordance with the effluent limitations and monitoring requirements set forth in this permit.

This permit is based on information provided in the permit application, which together with the following conditions and requirements are considered part of the permit. All requirements and ordinances of King County pertaining to the discharge of wastes into the King County sewerage system are hereby made a condition of this permit. All discharges and activities authorized herein shall be consistent with the terms and conditions of this permit.

This permit is not transferable without authorization from King County. Failure to provide advance notice of a transfer renders this waste discharge permit voidable on the date of facility transfer.

By

Program Manager
Industrial Waste Program

TABLE OF CONTENTS

- S1 Emergency Contacts
 - S2 Permit Summary and Company Identification
 - S3 Special Conditions or Compliance Schedule
 - S4 Effluent Limitations and Self-Monitoring Requirements
 - S5 Sample Site Access and Identification
 - S6 Notification Requirements
 - S7 Monitoring and Record Keeping
 - S8 Operations and Maintenance
 - S9 General Conditions
 - S10 Washington Department of Ecology Conditions
 - S11 Organic Chemical Definition and Reporting Requirements
- Company Fact Sheet
- Glossary
- King County Code – Title 28
- King County Local Limits

S1. EMERGENCY CONTACTS

KING COUNTY

Industrial Waste Program (8:00 a.m.-5:00 p.m., weekdays): 206-263-3000

Industrial Waste Investigator:

Program Manager, Industrial Waste:

Your emergency contact after 5:00 p.m. weekdays and on weekends is:

West Point Treatment Plant 206-263-3801

If unable to reach anyone at this number call:

South Treatment Plant: 206-684-2404

WASHINGTON STATE DEPARTMENT OF ECOLOGY

24-Hour Emergency Spill Phone No.: 425-649-7000

S2. PERMIT SUMMARY AND COMPANY IDENTIFICATION

A. Summary Information

The following industrial waste discharge sites have been identified for this facility:

<i>Sample Site No.</i>	<i>Limit Type</i>	<i>Daily Maximum Discharge Volume (gpd)</i>	<i>Description</i>
A4073	King County Local Limits	25,000	Opening on top of horizontal discharge pipe located on the northwest corner of "inside wash" building (aperture and sample tap).

Effluent limitations and self-monitoring requirements for this sample site are detailed in S4.A. of this permit.

B. Reports

<i>Report Name</i>	<i>Section(s)</i>	<i>Due Date</i>
Monthly self-monitoring reports	S4.A	15th day of each month.
14-Day Report: Discharge Violation or Permit Violation.	S4.D	Within 14 days after a discharge or permit violation becomes known.
5-Day Report: Slug Discharge or Spill	S6.A	Within 5 days after a slug discharge or spill.
Ecology Dangerous Waste Reports	S6.D	As requested by King County.
Installation/Upgrade of Pretreatment System Report	S6.C	Prior to installation or upgrade.
Slug/Spill Control Plan	S6.A	As requested by King County.

C. Major Changes in the Renewed Permit

This renewed permit contains the following major changes since last issuance:

1. The requirement to evaluate the need for flow-proportional composite sampling. (See S3.A.)

D. Company Identification

SIC Code No.: 7699

Hazardous Waste Generator No.: WAD 0000 66084

Industry Type: Steel/plastic drum and intermediate bulk container (IBC) reconditioning and steel drum manufacturing.

Due Date	Section(s)	Report Name
1 st day of each month	24.A	Monthly self-monitoring reports
Within 14 days after a discharge or permit violation becomes known	24.D	14-Day Report Discharge Violation or Permit Violation
Within 5 days after a spill, discharge or spill	24.A	3-Day Report Spill Discharge or Spill
As requested by King County	24.D	Biological Dangerous Waste Reports
Prior to installation or upgrade	26.C	Installation/Upgrade of Treatment System Report
As requested by King County	24.A	Spill/Spill Control Plan

S3. SPECIAL CONDITIONS OR COMPLIANCE SCHEDULE

A. In order to make a determination of appropriate 24-hour composite sample collection methods, Industrial Container Services shall submit one of the following reports by January 3, 2009:

1. A plan, for King County approval, to implement flow-proportional sampling at site number A4073; or
2. A document detailing why time-proportional composite sampling provides a representative sample for compliance. King County will use this documentation when it considers whether or not time-proportional composite sampling will be authorized. At a minimum this report shall include the following:
 - a. Flow volumes from different processes and batch discharges;
 - b. The variability of these flows and the pollutant levels anticipated in each waste stream;
 - c. The treatment systems employed;
 - d. The variability observed in wastewater to date; and
 - e. Any available comparisons between time and flow-proportional composite samples from this or similar sites.
3. If Industrial Container Services submits a plan to implement flow-proportional composite sampling or King County determines that flow-proportional composite sampling is required, Industrial Container Services shall have no more than 90 days after receipt of King County's decision to implement flow-proportional composite sampling.
4. Time-proportional composite sampling is authorized in the interim.

B. Industrial Container Services is prohibited from cleaning drums and IBC (intermediate bulk container) plastic totes that have contained the following substances (unless they are certified as having been triple rinsed in accordance with 40 CFR 261.7):

1. Pesticides
2. Herbicides
3. Cyanide compounds
4. Heavy metal-bearing materials or wastes that exceed the metals effluent limitations established in this permit.

C. Industrial Container Services is authorized to treat and discharge only wastes generated by cleaning empty drums and IBC plastic totes. A drum or IBC plastic tote is "empty" if:

1. All residue that can be removed by commonly employed methods (e.g., pouring, pumping, aspirating, etc.) has been removed;
2. No more than 2.5 centimeters (one inch) of residue remains on the bottom of the container; or
3. No more than three percent by weight of the total capacity of the container remains in the container if the container is less than or equal to 110 gallons in size, or no more than 0.3 percent by weight of the total capacity of the container remains in the container if the container is greater than 110 gallons in size.

S4. EFFLUENT LIMITATIONS & SELF-MONITORING REQUIREMENTS

A. Effluent Limitations and Self-Monitoring Requirements:

1. The Permittee shall comply with the following discharge limits and monitor its discharges to the King County sewerage system as specified below.

<i>Sample Site No.</i>	<i>Limit Type</i>	<i>Sample Site Description</i>			
A4073	King County Local Limits	Opening on top of horizontal discharge pipe located on the northwest corner of "inside wash" building (aperture and sample tap).			
<i>Parameter</i>	<i>Daily Average (mg/L)</i>	<i>Instantaneous Maximum (mg/L)</i>	<i>Maximum Loading* (lb/day)</i>	<i>Sampling Frequency</i>	<i>Sample Type</i>
Arsenic (As)	1.0	4.0	0.21	NA	NA
Cadmium (Cd)	0.5	0.6	0.10	Monthly	Composite
Chromium (Cr)	2.75	5.0	0.57	Monthly	Composite
Copper (Cu)	3.0	8.0	0.63	Monthly	Composite
Lead (Pb)	2.0	4.0	0.42	Monthly	Composite
Mercury (Hg)	0.1	0.2	0.02	NA	NA
Nickel (Ni)	2.5	5.0	0.52	Monthly	Composite
Silver (Ag)	1.0	3.0	0.21	NA	NA
Zinc (Zn)	5.0	10.0	1.04	Monthly	Composite
Acetone	See S11 for Screening Levels.			Quarterly	Composite
Benzene				Quarterly	Composite
Chloroform				Quarterly	Composite
Ethylbenzene				Quarterly	Composite
Methylene Chloride				Quarterly	Composite
Methyl ethyl ketone				Quarterly	Composite
Toluene				Quarterly	Composite
Bis(2-Ethylhexyl) Phthalate				Quarterly	Composite
Di-N-Butyl Phthalate				Quarterly	Composite
Di-N-Octyl Phthalate				Quarterly	Composite
Dibenzo(a,h)anthracene				Quarterly	Composite
Diethyl Phthalate				Quarterly	Composite
Dimethyl Phthalate				Quarterly	Composite
Phenol				Quarterly	Composite
Xylene				Quarterly	Composite
Cyanide Amenable (CN)	2.0	3.0	NA	NA	NA
Nonpolar FOG	100	NA	NA	Weekly	3 Grabs
<i>pH (s.u.)</i>	<i>Average Minimum</i>	<i>Minimum</i>	<i>Maximum</i>	Three times per week	Grab - Meter or other approved method
	5.5	5.0	12.0		
<i>Daily Maximum Discharge Volume (gpd)</i>	<i>Industrial</i>	<i>Other</i>	<i>Total</i>	Monthly	In-line meter or other approved method
	25,000	-0-	25,000		

* Applicable poundage limit for each parameter equals the daily average concentration in mg/L, multiplied by the flow in million gallons per day, multiplied by 8.34. A maximum loading of 0.01 is listed whenever the calculated poundage limit is 0.01 or less.

2. Self-monitoring report of all required and non-required sampling to be filed no later than the 15th day of the time period following the sample collection (i.e., the 15th day of the following month for monthly, weekly, daily samples; January 15, April 15, July 15, and October 15 for quarterly reports; January 15 for annual reports). The Permittee shall use the King County self-monitoring form to submit results unless an alternate form is approved by King County. If no discharge has occurred during the sampling time period, the report shall be submitted notifying King County that no discharge has occurred.
3. The total volume discharged for any processing day shall be calculated by reading the volume passing through meter number B527925 and 57765777 or shall be estimated using another King County approved method. The total volume for each processing day on which metal samples are collected shall be reported on self-monitoring reports. The total monthly discharge volume shall be reported on self-monitoring reports.
4. Volume and waste type from all batch discharges shall be recorded on the self-monitoring form.
5. For self-monitoring requirements, a flow-proportioned composite sample shall mean a sample composed of grab samples collected continuously or discretely, by hand or machine, in proportion to the flow at the time of collection or to the total flow since collection of the previous grab sample. The grab sample volume or frequency of grab collection may be varied in proportion to flow.
6. For self-monitoring requirements, if time-proportional composite sampling is authorized, a composite sample shall consist of four or more grab samples of equal volume collected at least 15 minutes apart and no more than two hours apart throughout the processing day from a well-mixed effluent chamber.
7. The three non-polar fats, oils, and grease (FOG) grab samples shall be of equal volume, collected at least five minutes apart, and analyzed separately. When using EPA approved protocols specified in 40 CFR Part 136, the individual grab samples may be composited (in the laboratory), prior to analysis. The result of the composite sample or the average of the concentrations of the three grab samples may be reported as Total FOG unless the value is 100 mg/L or greater, in which case the concentration of non-polar FOG must be reported.
8. Discharges of more than 50 gallons per day of caustic solutions equivalent to more than five percent (5%) NaOH by weight or greater than pH 12 are prohibited.
9. Should an automatic pH recording system (if required by permit or compliance order) fail, the Permittee shall manually check the pH at least four times per hour. Any discharge without a pH record shall be considered a violation of this permit.

B. Non-Required Self-Monitoring

All sampling data collected by the Permittee and analyzed using procedures approved by 40 CFR 136 or approved alternatives shall be submitted to King County whether required as part of this permit or done voluntarily by the Permittee.

C. Violation Criteria

1. Wastewater from regulated processes shall comply with the effluent limitations prior to dilution with other wastewaters unless a fixed alternative discharge limit is approved by King County. (See Section S8.C.4 and the glossary section at the end of this document for a definition of and further information about dilution.)
2. A review of any violation will include consideration of testing accuracy prior to enforcement action.
3. The more restrictive limitation (concentration or mass) shall prevail for determining violations.
4. Daily Average and Maximum Monthly Average Limits apply to composite samples and to grab samples from short-term batch discharges. (See the glossary section for a definition of composite and grab sample.)
5. Instantaneous Maximum Limits apply to grab samples, with the exception of grab samples from short-term batch discharges.
6. The instantaneous minimum pH limit is violated whenever any single grab sample or any instantaneous recording is less than pH 5.0. The daily minimum pH limit is violated whenever any continuous recording of 15 minutes or longer remains below pH 5.5 or when each pH value of four consecutive grab samples collected at 15-minute intervals or longer within a 24-hour period remains below pH 5.5.
7. The limit for nonpolar FOG (mineral origin) is violated when the arithmetic mean of the concentration of three grab samples (taken no more frequently than in five minute intervals), or when the result of a composite sample exceeds 100 mg/L.

D. Response When Violations Are Detected

1. When monitoring data shows a violation, the Permittee shall:
 - a. Take immediate action to stop the violation and notify King County Industrial Waste within 24 hours of learning of the violation.
 - b. Collect a sample and submit new data to King County within 14 days of becoming aware of the violation.
 - c. Submit a written report within 14 days of learning of the violation (*14-Day Report*). The report should explain the cause of the violation and

corrective actions taken to respond to the violation and ensure ongoing compliance.

2. In the event the Permittee is unable to comply with any of the conditions of this permit because of a breakdown of equipment or facilities, an accident caused by human error, negligence, or any other cause, such as an act of nature, the Permittee shall:
 - a. Take immediate action to stop, contain, and clean up the unauthorized discharges and correct the problem.
 - b. Immediately notify the emergency King County contact in Section S1 so steps can be taken to prevent damage to the sewerage system.
 - c. Submit a written report within 14 days of the event (*14-Day Report*) describing the breakdown, the actual quantity and quality of resulting waste discharged, corrective action taken, and the steps taken to prevent a recurrence.
3. Whenever an effluent check shows a pH violation, as defined in King County Code 28.84.060.N "Violations," the Permittee shall take immediate steps to bring the discharge back into compliance. If this is not possible, the Permittee shall cease discharge.
4. Compliance with these requirements does not relieve the Permittee from responsibility to maintain continuous compliance with the conditions of this permit or the resulting liability for failure to comply.

E. Limitations Applicable to All Sites

1. General

The Permittee's discharge shall not interfere with the operation of the King County sewerage system, cause King County to exceed its NPDES permit limits, or endanger local utility or King County sewer workers. (See the glossary section for a definition of interference.)

The Permittee's discharge shall not violate any discharge standard, limitation, or specific prohibition of King County Code 28.84.060 or local discharge limits applicable on the date of discharge. (See Section 28.84.060.D-F of King County Code.)

Prohibitions previously referenced include, but are not limited to, substances causing fire or explosion hazard, flow obstruction, excess oxygen demand, and toxic vapors.

Limitations listed in S4 include, but are not limited to, restrictions on settleable solids, organic compounds, hydrogen sulfide, and polar FOG.

2. Organic Compounds

No person shall discharge any organic pollutants that result in the presence of toxic gases, vapors, or fumes within a public or private sewer or treatment works in a quantity that may cause acute worker health and safety problems.

Organic pollutants subject to this restriction include, but are not limited to any organic compound listed in 40 CFR 433.11 (e) Total Toxic Organics (TTO) definition, acetone, 2-butanone (MEK), 4-methyl-2-pentanone (MIBK), and xylenes.

Dischargers are required to implement good "housekeeping" and best management practices in order to prevent the discharge of a concentrated form of any of the preceding organic pollutants.

F. Responsibility for Compliance

It is the responsibility of the Permittee to ensure that all effluent limitations of this permit are met whether or not self-monitoring for the parameter is required.

S5. SAMPLE SITE ACCESS AND IDENTIFICATION

- A. Unobstructed access to sample sites shall be available to authorized King County personnel during normal operating hours. The Permittee shall be responsible for providing alternate sample sites in the event of obstruction of access or upon evidence of tampering with the monitoring equipment.
- B. The Permittee shall allow King County to permanently label the sample sites used to collect wastewater samples.
- C. The Permittee shall at all reasonable times, allow authorized representatives of King County to enter, inspect, and sample as specified in King County Code 28.84.060.L, "Inspection and Sampling of Industrial Users."

S6. NOTIFICATION REQUIREMENTS

A. Spills and Slug Discharges

1. The Permittee shall notify King County Industrial Waste immediately in the event of a spill or slug discharge to the sanitary sewer. A written report regarding the cause of the spill and/or slug discharge shall be submitted to King County within five (5) days of date of occurrence. The report should explain the cause of the violation and corrective actions taken to respond to the violation and ensure ongoing compliance. (See the glossary section for a definition of slug discharge and Section S8.B for spill and slug discharge control procedures.)
2. Following a spill and/or slug discharge, King County may require the submission or modification of a spill/slug control plan.

B. Changes In Discharge Characteristics

The Permittee shall inform King County Industrial Waste prior to any facility or manufacturing changes that will result in:

1. Introduction of new wastewater pollutants.
2. Significant alteration in the volume (> 20% increase from permit application) or character of the pollutants discharged to the King County sewerage system.
3. Discharge of wastestreams not listed in the permit application.
4. Addition of a new point of discharge or a new chemical, process, product, manufacturing line, or waste processing activity.
5. Changes in the potential for spill or slug discharges.

No change shall be made until plans have been approved and either written permission or a new or modified permit has been received. In no case are any changes permitted that will cause violation of the effluent limitations specified herein.

C. Installation/Upgrade of Pretreatment System

A Professional Engineer's report per WAC 173-240 must be approved prior to installation or upgrade of pretreatment system.

D. Hazardous Wastes

Within 180 days following commencement of discharge or permit issuance, whichever is later, the Permittee must notify King County Industrial Waste, the U.S. Environmental Protection Agency, and the Washington State Department of Ecology of any discharge of a listed or characteristic RCRA hazardous waste. Identifying the listed or characteristic RCRA hazardous wastes on the Permittee's wastewater discharge permit application serves as notice to King County. This is a one-time notification requirement. The contents of the notification may vary according to the quantity of waste discharged. (See "Notification of the Discharge of Hazardous Wastes" in King County Code 28.84.060.)

Whenever the U.S. Environmental Protection Agency publishes new RCRA rules identifying additional hazardous wastes or new characteristics of hazardous wastes, the Permittee must notify King County Industrial Waste, the U.S. Environmental Protection Agency, and the Washington State Department of Ecology if any of these wastes are discharged to the King County sewerage system. Notification must occur within 90 days of the effective date of the published regulation. (See the glossary section for a definition of hazardous wastes.)

E. Continuing Discharge After Permit Expiration Date

This permit does not authorize discharge after its expiration date. If the Permittee wishes to continue discharge after the expiration date, an application must be filed for reissuance of this permit at least 180 days prior to the expiration date. If the Permittee submits its reapplication in the time specified herein, the Permittee shall be deemed to have an effective waste discharge permit or authorization until King County issues or denies the new waste discharge permit. If the Permittee fails to file its reapplication in the time period specified herein, the Permittee will be deemed to be discharging without a discharge permit after the current permit's expiration date.

S7. MONITORING AND RECORD KEEPING

A. Record Keeping and Retention

The Permittee shall maintain records relating to all permitted discharges to the King County sewerage system including routine maintenance, waste disposal dates, manifests, self-monitoring reports, analytical lab results, pH monitoring records, and flow records.

All records required by the permit shall be available for review at reasonable times by authorized representatives of King County.

Records of all such testing shall be retained for a period of three (3) years unless litigation or the direction of the King County Industrial Waste Program requires an extension of that time.

B. Recording of Results

For each measurement or sample taken to comply with this permit, the Permittee shall record the following information:

1. Date, exact place, and time of sampling;
2. Dates the analyses were performed;
3. Person who performed the analyses;
4. Analytical techniques or methods used; and
5. Results of all analyses.

C. Representative Sampling

Samples and measurements taken to meet the requirements of this condition shall be representative of the volume and nature of the monitored discharge.

D. Test Procedures

All analyses shall be performed in accordance with procedures established by the Administrator of the U.S. Environmental Protection Agency pursuant to Section 304(g) of the Federal Clean Water Act and contained in 40 CFR Part 136 and amendments thereto or with any other test procedure approved in writing by the EPA Administrator, and/or King County. In all cases, except total dissolved sulfide, the detection limit shall be well below the discharge limit. Where 40 CFR Part 136 does not include a sampling or analytical technique for the pollutant in question, sampling and analysis shall be performed in accordance with the procedures set forth in the EPA publication entitled "Sampling and Analysis Procedures for Screening of Industrial Effluents or Priority Pollutants, April 1977" or "Standard Methods," Latest Edition and amendments thereto, or with any other sampling and analytical procedures approved by the EPA.

E. Lab Accreditation

All self-monitoring data submitted to King County that required a laboratory analysis must have been performed by a laboratory accredited by the Washington State Department of Ecology for each parameter tested. This does not apply to field measurements performed by the Permittee such as pH, temperature, flow, atmospheric hydrogen sulfide, total dissolved sulfides, settleable solids by Imhoff cone, or process control information.

F. Falsifying Information

The act of knowingly falsifying, tampering with, or knowingly rendering inaccurate any monitoring device, report, or method required pursuant to the federal pretreatment standards, King County Code 28.84.060, or special conditions of this permit shall constitute a violation of this permit, and shall be subject to the legal remedies available under "Revocation of Permit or Authorization" and "Penalties and Enforcements" in King County Code 28.84.060.

G. Toxicity Testing

If King County is required by the Washington State Department of Ecology to determine the source of a pattern of acute toxicity pursuant to its Treatment Plant NPDES permit, the Permittee may be required to test its effluent for toxicity according to procedures to be determined by King County.

H. Signatory Requirements for Industrial User Reports

Any report required by this permit shall meet the signatory and certification requirements listed in King County Code 28.84.060 and King County Code 28.82.

S8. OPERATIONS AND MAINTENANCE

The Permittee shall use waste preventative practices to reduce or eliminate contaminant loading to the King County sewerage system. These practices shall include proper chemical storage, spill prevention and notification, and maintenance and operation of any required pretreatment equipment.

A. Chemical Storage

Chemical solutions, solid chemicals, waste materials, oils, and solvents shall be stored in a manner that will prevent the entry of these materials into the King County sewerage system.

1. Non-compatible chemicals shall be segregated and securely stored in separate containment areas that prevent mixing of incompatible or reactive materials.
2. The Permittee shall install shut-off devices to all drains in any hazardous waste storage areas.
3. Chemicals shall be dispensed only in roofed and bermed areas that eliminate potential spills to the King County sewerage system.
4. All empty barrels that have not been cleaned (steam-cleaned or triple-rinsed) shall be adequately stoppered and stored in an upright position.
5. Process tanks shall be located in a bermed, roofed, secured area capable of containing 110 percent of the volume of the largest tank. The Permittee shall ensure that process solutions are used and stored in such a manner as to minimize spills of concentrated solutions to the sanitary sewer.

B. Spill or Slug Discharge Control Procedures (See Section S6.A.)

1. In the event of a concentrated solution spill such as a tank failure, the Permittee shall not discharge any spilled solution to the metropolitan sewer system unless laboratory test results indicate that the substance meets the conditions of this permit and the Permittee receives approval from the King County Industrial Waste Program.
2. Concentrated waste or spilled chemicals that do not meet, or are not treated to meet, the discharge conditions of this permit shall be transported offsite for disposal at a facility approved by the Washington State Department of Ecology or appropriate county health department.
3. The Permittee shall maintain and inspect all process solution tanks on a regular basis. Any leaks shall be repaired promptly.
4. The Permittee shall use spill prevention practices to preclude the discharge of liquids, solids, or gases which by reason of their nature or quantity are, or may be, sufficient either alone or by interaction with other substances to cause fire or explosion.

5. All process tanks and chemical storage containers shall be accurately labeled. Emergency phone numbers of King County, Fire Departments, your company's 24-hour corporate contact, and Washington State Department of Ecology shall be posted at all sites that King County requires.
6. The Permittee shall ensure that concentrated waste from process tank filters and other equipment is prevented from entering the sanitary sewer unless it is treated to meet the discharge conditions of this permit.
7. The Permittee shall maintain and use product recovery options such as drag-out rinses for each plating bath or process as required to meet the discharge conditions of this permit. Recovered materials shall not be discharged to the sanitary sewer unless they are treated to meet the discharge conditions of this permit.

C. Pretreatment Equipment Maintenance and Operations

1. All pretreatment systems used to bring the Permittee's discharge into compliance with King County's discharge limitations shall be maintained continuously in satisfactory and effective operations by the Permittee at the Permittee's expense, and shall be subject to periodic inspections by authorized King County personnel. These systems shall be attended at all times during discharge to the King County sewerage system. In the event that such equipment fails, the Permittee must notify King County immediately and take spill prevention precautions.
2. The Permittee shall not initiate construction or modification of a pretreatment system prior to receiving King County approval of plans and specifications per WAC 173-240. In addition, King County may require an engineering report and an operations and maintenance manual.
3. King County shall be contacted before the beginning of any limited experimental modifications or new equipment testing that could reasonably be expected to affect effluent quality or quantity. This experimental work shall proceed only after securing written approval from King County and following the Permittee's adherence to any applicable special conditions.
4. The effluent limitations specified in this permit are to be met by treatment of the wastes for pollutant removal. The use of municipal water, ground water, seawater, storm water or other materials, including waste products, for the purpose of diluting a waste to achieve those limitations is prohibited.
5. The Permittee shall adequately maintain and efficiently operate all treatment or control facilities or systems installed or used by the Permittee to achieve compliance with the terms and conditions of this permit.

D. Water/Sewer Meter Requirements

The Permittee shall obtain or maintain access to a water or sewer meter that can provide accurate information regarding industrial process wastewater and cooling water discharge to the sewer. Another method of volume determination may be used only upon approval by King County.

E. Solid Waste

1. The Permittee shall handle and dispose of all solid waste material (as defined in WAC 173-304-100) not otherwise authorized by this permit in such a manner as to prevent its entry into the King County sewerage system.
2. All covers, screening devices, sumps, hoppers, conveyors, and other facilities provided for the recovery and handling of solid wastes are to be maintained in an efficient operating condition.

F. Stormwater

Stormwater, surface water, ground water, and roof runoff shall be excluded, except where specifically authorized by this permit or King County Code 28.84.060, from the King County sewerage system.

S9. GENERAL CONDITIONS

- A. The discharge of any pollutant more frequently than, or at a level in excess of, that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit. Whenever the Permittee refuses to take corrective action or continues the violating condition, the imposition of civil penalties including fines up to \$10,000 for each violation per day and/or termination of this permit may result. Termination of this permit may require disposal of the industrial waste in some manner other than into the public sewer, private sewer, or side sewer tributary to the King County sewerage system at the expense of the person holding the permit. Any person causing damage to a public sewer or treatment facility by discharges in violation of the terms and conditions of this permit shall be liable for any such damage incurred by King County as a result of such damage or discharge.
- B. The diversion or bypass of any discharge from any pretreatment facility utilized by the Permittee to maintain compliance with the terms of this permit is prohibited except where unavoidable to prevent loss of life or severe property damage. The procedure outlined in Section S4.D. shall be followed in case of such a diversion or bypass.
- C. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its terms for those causes cited in King County Code 28.84.060.
- D. If a toxic standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307 (a) of the Federal Clean Water Act for a toxic pollutant which is present in the discharge authorized herein, and such standard or prohibition is more stringent than any limitation upon such pollutant in this permit, this permit will be revised or modified in accordance with the toxic effluent standard or prohibition and the Permittee shall be so notified. Section 307 (a) requires that the Administrator of the Environmental Protection Agency shall promulgate effluent standards (or prohibitions) for toxic pollutants which he or she has listed as such.
- E. Nothing in this permit shall be construed as excusing the Permittee from compliance with any applicable federal, state, or local statutes, ordinances, or regulations.
- F. All requirements and ordinances of the U.S. Environmental Protection Agency and the Washington State Department of Ecology pertaining to hazardous and toxic wastes, disposal facilities, and discharge of wastes into the King County sewerage system, are hereby made a condition of this permit.

S10. WASHINGTON DEPARTMENT OF ECOLOGY CONDITIONS

This permit does not constitute authority for discharge into waters of the state. Any such discharge is subject to enforcement action by the Department of Ecology.

Upon issuance of this permit, the Permittee assumes the responsibility to abide by the following environmental requirements, and any other appropriate regulations stipulated by the Department of Ecology. **The Department of Ecology retains authority to enforce these permit conditions (RCW 70.105 and RCW 90.48).**

Conditions To Protect Ground and Surface Waters

1. Contaminated waters or wastes shall not be discharged to state waters.
2. Boiler blow down and water shall not be discharged to state waters.
3. Solid chemicals, chemical solutions, waste materials, oils, and solvents shall be stored in a manner which will prevent the entry of these materials into state ground or surface waters, and in a manner that will prevent spillage by overfilling, tipping, or rupture.
4. The Permittee shall handle and dispose of all solid waste material in such a manner as to not cause any adverse effect on ground or surface water quality.
5. Filtered solids or sludge shall be stored in such a manner that drainage from this material is prevented from either draining across public rights-of-way or entering the local storm drain system or the ground water.
6. No emulsifiers or dispersants are to be used on waters of the state without approval from the Department of Ecology.
7. If corrosive processing solutions are used, the processing/plating floor shall be sealed with corrosion resistant material that prevents leakage. This coating shall be repaired or replaced as needed.

Questions regarding the implementation of conditions outlined in Section S10 should be directed to the regulatory authority, the Washington State Department of Ecology, at 425-649-7000 (Northwest Regional Office, 3190 160th Avenue SE, Bellevue, Washington 98008-5452).

S11. ORGANIC CHEMICAL DEFINITIONS & REPORTING REQUIREMENTS

The local limit for organic compounds prohibits the discharge of any organic pollutant that results in the presence of toxic gases, vapors, or fumes within a public or private sewer or treatment works in a quantity that may cause worker health and safety problems. The local limit also provides the authority to use various methods (applied on a site-specific basis) for limiting the discharges of organic compounds.

Screening levels in the following table have been calculated for many of the organic compounds that are commonly used in industries and have OSHA or NIOSH occupational exposure limits (OEL). Screening levels are the concentration in the wastewater that could potentially produce sewer gas concentrations in excess of the OEL. The calculations of the screening levels are based on Henry's law equilibrium between the organic compound in the wastewater and the sewer gases.

A. Screening Levels for Selected Organic Compounds

Discharges that exceed the following screening levels have the potential to cause health hazards in the sewage collection system or indicate that treatment has not been sufficient enough to remove hazardous waste characteristics.

Compound	CAS Number	Screening Level (mg/l)
Acetone	67-64-1	36.0
Benzene	71-43-2	0.07
Chloroform	67-66-3	0.06
Ethyl benzene	100-41-4	1.7
Methylene chloride	75-09-2	4.1
Methyl ethyl ketone	78-93-3	200.0
Phenol	108-95-2	633.0
Toluene	108-88-3	1.4
Xylenes (Total)	1330-20-7	2.2
Bis(2-Ethylhexyl) Phthalate	117-81-7	No screening level
Di-N-Butyl Phthalate	84-74-2	No screening level
Dibenzo(a,h)anthracene	53-70-3	No screening level
Diethyl Phthalate	84-66-2	No screening level
Dimethyl Phthalate	131-11-3	No screening level

- C. The permittee shall indicate in the self-monitoring report whether the organic chemical monitoring results exceed any of the screening levels listed in S11.A.
- D. Whenever King County or the permittee's self-monitoring results exceed the screening level for three out of four months, the permittee shall submit a plan indicating the steps that will be taken to ensure that organic chemical discharges do not exceed screening levels. The plan shall be submitted within 30 days of the third self-monitoring report that shows organic chemical discharges that exceed screening levels. The report shall indicate the steps that will be taken to reduce organic chemical concentrations so that they remain consistently below screening levels within 60 days.

KING COUNTY INDUSTRIAL WASTE COMPANY FACT SHEET

Date: October 1, 2009

COMPANY INFORMATION

Company Name: Industrial Container Services
Plant Address: 7152 First Avenue S.
Seattle, WA 98108
Mailing Address: 7152 First Avenue S.
Seattle, WA 98108
Treatment Plant: West Point
Corp. Contact & Phone: [REDACTED]
Plant Contact & Phone: [REDACTED]
Company Type: Steel/plastic drum and intermediate bulk container (IBC)
reconditioning and steel drum manufacturing
Days Operating: 260
SIC#: 7699
EPA ID #: WAD000066084
Investigator: [REDACTED]

PERMIT INFORMATION

Permit No.: 7130-03
Effective Date: October 3, 2009
Expiration Date: October 2, 2014

DESCRIPTION OF SAMPLE SITES, LIMIT TYPES, & DISCHARGE VOLUMES

Sample Site No.	Description	Limit Type	Maximum Industrial Volume (gpd)
A4073	Aperture - NW corner	KCLL GT 5000	25,000
Total Industrial discharge volume (gpd) (add all sites)			25,000

SELF-MONITORING REQUIREMENTS

Sample Site No.	Parameter	Sample Type	Frequency
A4073	2-Butanone (MEK)	composite	quarterly
A4073	Acetone	composite	quarterly
A4073	Benzene	composite	quarterly
A4073	Bis(2-Ethylhexyl)Phthalate	composite	quarterly
A4073	Methylene Chloride	composite	quarterly
A4073	Ethylbenzene	composite	quarterly
A4073	Di-N-Butyl Phthalate	composite	quarterly
A4073	Di-N-Octyl Phthalate	composite	quarterly

A4073	Dibenzo(a,h)anthracene	composite	quarterly
A4073	Diethyl Phthalate	composite	quarterly
A4073	Dimethyl Phthalate	composite	quarterly
A4073	Total Xylenes	composite	quarterly
A4073	Phenol	composite	quarterly
A4073	Toluene	composite	quarterly
A4073	Chloroform	composite	quarterly
A4073	Cadmium, Total, ICP	composite	monthly
A4073	Chromium, Total, ICP	composite	monthly
A4073	Copper, Total, ICP	composite	monthly
A4073	Discharge Rate	continuous	monthly
A4073	Discharge Rate Daily Max	continuous	monthly
A4073	Lead, Total, ICP	composite	monthly
A4073	Nickel, Total, ICP	composite	monthly
A4073	Total Monthly Flow	continuous	monthly
A4073	Zinc, Total, ICP	composite	monthly
A4073	Hem (oil, total)	3 grabs	weekly
A4073	pH-Field, Max	grab	3x_per_week
A4073	pH-Field, Min	grab	3x_per_week

MONITORING FEE PARAMETER

Sample Site No.	Fee Type
A4073	Heavy Metals Fee Parameter (ICR)
A4073	Fats, Oils & Grease Fee Parameter (ICR)

PERMIT PROCESSING

Permit No. 7130-04

ACTION	DATE
Application Received	May 13, 2009
Fee Requested	August 13, 2009
Fee Paid	September 14, 2009
Date Public Comment Period Ended	NA
Draft Issued	September 14, 2009
Final Issued	October 1, 2009

COMMENTS

Nature of Business

This barrel washing/manufacturing business has been in existence since 1945. Although the types of work and processes have not changed, the site has changed ownership many times. This site has been permitted with Industrial Waste since the mid-1970s.

In addition to their industrial waste, Industrial Container Services calculated that on a daily average there is 1,542 gallons per day (gpd) of stormwater (based on 37,053 sq. ft. @ 37.19 inches annual rainfall) discharged to the sanitary sewer. The actual maximum daily stormwater flows will be characterized when the company completes the flow-proportional sampling evaluation requirement detailed in Special Condition S3.A. King County will then confirm whether or not the stormwater discharge from this facility meets the 0.2 cfs/acre criteria. The majority of rainwater from the roof drains is collected and used on site. Roof drains that face west/northwest discharge to the Duwamish River via city storm drains.

Sources of Wastewater

Wastewater is generated from the cleaning, manufacturing, or reconditioning of steel drums, plastic drums, and intermediate bulk containers (IBC). There is also stormwater treatment when it rains. Industrial Container Services discharges approximately 1,542 gallons of stormwater daily (based on 37,053 sq. ft. @ 37.19 inches annual rainfall) to the sanitary sewer.

Treatment System

Wastewater flows from the three barrel and tote cleaning operations to the primary settling tank where the pH is lowered and a coagulant injected. From there the wastewater enters an oil skimmer. The wastewater then flows into the mix tank where the pH is raised and a flocculant injected. The wastewater then flows into one of two 10,000-gallon holding tanks where further solid settling takes place. The wastewater then flows through a 4,000-gallon, 7,500-gallon, and finally an 8,000-gallon tank into the sewer.

Compliance History

The only exceedence in the last five years was a screening violation for MEK, toluene, and total xylenes during King County monitoring in November 2008.

Trends in Discharge of Pollutants of Concern

In reviewing the metals data over the last five years all metals were below 1.0 mg/L, except for zinc, which was 1.38 mg/L and 1.29 mg/L in 2004 and 1.68 mg/L and 2.42 mg/L in 2008.

Slug Control Plan

On file – acceptable. Submitted on October 13, 2006.

Self-Monitoring Requirements

Industrial Container Services monitors for FOG, pH, flow, metals, VOAs, and BNAs.

King County Monitoring Schedule

Industrial Container Services is compliance sampled twice per year for heavy metals, non-polar FOG, BNAs, VOAs, and pH.

Flow-Proportional Sampling

Industrial Container Services shall evaluate the need for flow-proportional sampling. The evaluation report will be due on or before January 3, 2009. If it is determined that flow-proportional sampling is required, Industrial Container Services will have 90 days to implement.

Special Conditions

Special Condition A refers to the requirement to evaluate the need for flow-proportional monitoring at this facility.

Special Condition B details the restrictions on cleaning containers that have contained pesticides, herbicides, cyanide compounds, and heavy metal bearing materials or wastes that exceed the metal effluent limitations without certification that they have been triple rinsed.

Special Condition C describes and defines what an "empty" container is prior to washing at this facility.

Limit Calculations

On August 4, 2009, during the annual permit inspection, a small phosphating operation was noticed. At one time King County did not designate these operations as categorical metal finishing 433 companies.

The facility contact discussed options with King County and rather than obtain a permit under the metal finishing designation, the company chose to change the cleaning chemical from one that contains phosphoric acid to an alkaline cleaning solution.

They will stay permitted under the King County local limits greater than 5,000 gpd designation.

Changes Since the Last Permit

Changing the chemical used in the new barrel washing process.

Company and Agency Comments

The company called on September 15, 2009 concerning the due date for the evaluation of flow-proportional sampling. Company requested more time and King County granted the request. The new due date is January 3, 2010. No comments received from the local sewer agency.

Safety

Steel-toed boots and safety glasses required.

United States Environmental Protection Agency
Criminal Investigation Division
Investigative Activity Report

Case Number

1000-M463

Case Title:

Industrial Container Services - WA LLC

Reporting Office:

Seattle, WA, Area Office

Subject of Report:

20130322 Meeting with the Puget Sound Clean Air Agency.

Activity Date:

March 22, 2013

Reporting Official and Date:

[REDACTED]

Special Agent

25-MAR-2013, Signed by: [REDACTED]

Approving Official and Date:

[REDACTED]

Special Agent in Charge

25-MAR-2013, Approved by: [REDACTED]

Assistant Special Agent in Charge

SYNOPSIS

On March 12, 2013, SA [REDACTED] met with representatives of the Puget Sound Clean Air Agency regarding the activities of Industrial Container Services.

DETAILS

On March 12, 2013, I met with representatives of the Puget Sound Clean Air Agency regarding the activities of Industrial Container Services. The meeting was held with [REDACTED] and [REDACTED] to explain that EPA CID is currently investigating some allegations of potentially illegal activities occurring at the ICS plant in Seattle, Washington.

During the meeting a history of the plant was discussed and I was given copies of the company's permits for review.

Puget Sound Clean Air Agency explained that they would be cooperative with any investigation.

ATTACHMENT

20130322 Air Permit.pdf

20130322 Air Permit Part 2.pdf

This document contains neither recommendations nor conclusions of the EPA.
It is the property of the EPA and is loaned to your agency;
it and its contents are not to be distributed outside your agency.

Activity Record

Employee	Initials	Date Completed
1.		
2.		
3.		
4.		

Puget Sound Clean Air Agency
1904 3rd Ave, Ste 105
Seattle, WA 98101-3317

Evaluation Report

Reg #: 11683
AFS #: 11683
Status: Active

Emission Capped

Facility: Industrial Container Services - WA, LLC
Physical Address: 7152 1st Ave S
Seattle 98108
Invoice Address: 7152 1st Ave S
Seattle WA 98108

Personal Protective Equipment Checklist

Determined by Inspector based on
Compliance Manual Policy 101

Worn	Safety Equipment	Req/Op
<input type="checkbox"/>	None	
<input type="checkbox"/>	Hard Hat	R
<input type="checkbox"/>	Goggles	
<input type="checkbox"/>	Safety Glasses	R
<input type="checkbox"/>	Hearing Protection	R
<input type="checkbox"/>	Respirator	
<input type="checkbox"/>	Safety Shoes	
<input type="checkbox"/>	Rubber Boots	
<input type="checkbox"/>	Leather Gloves	
<input type="checkbox"/>	Chemical Gloves	
<input type="checkbox"/>	Coveralls	
<input type="checkbox"/>	Tyvek	
<input type="checkbox"/>	Safety Vest	
<input type="checkbox"/>	Other	

Inspector SJF Engineer GSP

Last Onsite Compliance 06/20/2012

Contacted

- ☐ [REDACTED] Facility Manager
☐ [REDACTED], Maintenance Manager
☐ [REDACTED] Operations Manager
☐
☐

Phone**Fax****E-mail**

[REDACTED]@iconserv.com

NAICS: 811310 - Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance

Evaluation Date: Clean Air Reps:

Evaluation Type: ☐ Onsite Compliance ☐ Onsite Observation ☐ Follow-up

Evaluation Summary:

Updates: ☐ AOD ☐ Equipment ☐ NOC ☐ Operating Status ☐ Owner/Name ☐ Other

Attachments:

NOV/WW # Issued:

Other Action:

Evaluation Prepared by:

Date:

Onsite Compliance Evaluations (Last 3)

Eval Date	Inspector	Inspector Notes	NOV/WW
06/20/2012	MM	OA 9500 #3 - Source verified + updated O&M forms. Also advised to close back door on drum spray booth. Updated equip info.	
03/01/2011	MM	In operation. No VE. Records and facility inspection.	
06/25/2010	MM	CSR - no violations. Respond to odor complaints as needed. Date O&M logs correctly. Updated equip list.	

Onsite Observation Evaluations (Last 3)

Eval Date	Inspector	Inspector Notes	NOV/WW
03/01/2011	MM	N V 3-005437 issued corrected violation date during complaint inspection for 9.20 [I] and OA 9500 # 8.	3-005437

Offsite Report Evaluations (Last 18 Months) - None

Onsite Complaint Evaluations (Last 3)

Eval Date	Inspector	Inspector Case#	Case Type	NOV/WW
03/03/2011	MM	2011500061	Visible Emission	3-005437
02/24/2003	MM	2003500411	Odor	

Violation History (Last 2 Years) - None

Open AOD Conditions - None

Notices of Construction / Notifications Evaluation Pending - None

Notices of Construction / Notifications

Inactive?	NOC / Notice #		Approved	Evaluated
<input type="checkbox"/> GSP initials				
<input type="checkbox"/>	1954	Blasting B/H	07/20/1979	12/20/2002
<input type="checkbox"/>	3063	Shot Blaster/Baghouse	06/07/1988	12/20/2002
<input type="checkbox"/>	5965	Synthetic Minor Emission Cap	06/21/1995	06/21/2005

Synthetic Minor Limit

Northwest Cooperage shall limit air emissions of total VOC compounds to 99 tons during any 12 consecutive months after the date of this Order.

Northwest Cooperage shall limit the emissions of methyl ethyl ketone, xylene and toluene each to less than 9 tons during any 12 consecutive months after the date of this Order.

Northwest Cooperage shall limit the emissions of methyl ethyl ketone, xylene and toluene combined to 24 tons during any 12 consecutive months after the date of this Order.

Synthetic Minor Conditions

Northwest Cooperage shall perform a source test to quantify the destruction efficiency of the control system for the quantification of the emissions of VOC compounds by EPA Method 25.

Northwest Cooperage shall maintain monthly records of Methyl Ethyl Ketone, Xylene and Toluene purchased that contribute to air emissions.

Northwest Cooperage shall produce a monthly summary report which shall be made available to PSAPCA personnel upon request.

Northwest Cooperage shall annually report to PSAPCA with its annual emission statement all periods that exceed the above limits.

Description

Synthetic Minor Emission Cap.

<input type="checkbox"/>	9500	afterburner	09/22/2006	01/31/2007
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Conditions

Notices of Construction / Notifications

Inactive? NOC / Notice #

GSP initials

Approved Evaluated

DRUM RECLAMATION FURNACE

3. The drum processing rates in the reclamation furnace shall not exceed five fruit drums and one industrial drum per minute.
4. All drums processed in the reclamation furnace shall be 'drip dry' and shall contain no more than 1 inch of residue.
5. No drums shall be processed in the reclamation furnace unless the reclamation furnace afterburner chamber temperature is at least 1,700 degrees F.
6. An electronic interlock shall automatically shutdown the drum staging conveyor if the afterburner chamber temperature drops below 1,700 degrees F.
7. The afterburner chamber temperature shall be continuously recorded whenever drums are being processed in the reclamation furnace, and such records shall be retained for at least 2 years for inspection by Agency staff.
8. There shall be no visible emissions from the drum reclamation furnace exhaust.
9. The monthly (and 12-month rolling total) emissions from the afterburner shall be estimated by multiplying the hourly emission rates measured during the source test by the hours of operation of the drum reclamation furnace afterburner.
10. The monthly (and 12-month rolling total) emissions from the paint spray booths shall be estimated based on the results of a source test which shall be conducted within 90 days of the installation of the RTO in accordance with a test plan approved by the Agency.

PAINT CURING OVEN

11. The Regenerative Thermal Oxidizer (RTO) shall have a destruction efficiency of at least 98% or an outlet concentration of no more than 40 ppm, as determined by EPA Method 25A.
12. A source test shall be conducted within 90 days of the installation of the RTO to determine compliance with Condition 11 of this Order.
13. The RTO combustion chamber temperature shall be continuously monitored and recorded whenever the paint curing oven is in operation, and such records shall be retained for at least 2 years for inspection by Agency staff.
14. The RTO combustion chamber temperature shall be at least 1600 degrees F (1-hour average) or the temperature recorded during the compliance test (whichever is lower) at all times when the paint curing oven is in operation.
15. There shall be no visible emissions from the RTO.
16. This Order of Approval No. 9500 hereby cancels and supersedes Orders of Approval No. 8790 dated July 1, 2003, No. 7131 dated February 13, 1998, and No. 2976 dated January 19, 1988.

Description

One MegTEC Millennium 060-95 Regenerative Thermal Oxidizer for the existing Paint Curing Oven, which is presently vented to the existing Drum Reclamation Furnace Afterburner.

Air Contaminant Generating Equipment, Associated Control Equipment

Inactive?

- | | | | | |
|--------------------------|--------|--|----------------------|----------------|
| <input type="checkbox"/> | (1) | boiler, water heater or oil heater
Former Description: Boiler
Superior #2 Diesel (Back-up)
Rated: 8 Million BTU/Hr
Natural Gas / Dist (#2 Oil or PS-300) | Year Installed: 1990 | NC/NOT #: |
| <input type="checkbox"/> | (2) | miscellaneous
Former Description: Furnace
Drum Reclaiming Natural Gas - source Test 3/2/04
Rated: 12 Million BTU/Hr | Year Installed: 1996 | NC/NOT #: |
| <input type="checkbox"/> | CE (4) | Afterburner
Drum Furnace 12 Mmbtu/Hr Mdh W/4 Nat Gas Mod 44-28
Rated: 36820 CFM | Year Installed: 1998 | NC/NOT #: 9500 |
| <input type="checkbox"/> | (3) | curing oven
Former Description: Oven
Curing - Finish Paint 300 PSI Applicator Press
Rated: 4 Million BTU/Hr
Natural Gas / Propane | Year Installed: 1963 | NC/NOT #: |
| <input type="checkbox"/> | CE (6) | Afterburner
MegTEC Millennium RTO
Rated: 5000 CFM | Year Installed: | NC/NOT #: 9500 |

Air Contaminant Generating Equipment, Associated Control Equipment**Inactive?**

- ☐ (5) abrasive blasting/shot peening cabinet, booth or room
Former Description: Abrasive Blasting
Cabinet - Steel Shot Wheelabrator (Not in Use)
Rated: 448200 Lb/Hr Year Installed: 1964 NC/NOT #:
- ☐ CE (1) Baghouse
Shotblasting
Rated: 7000 CFM Year Installed: 1979 NC/NOT #: 1954
- ☐ (6) abrasive blasting/shot peening cabinet, booth or room
Former Description: Abrasive Blasting
Cabinet - Northwest Cooperage Main Blaster & Lid Blaster
Rated: 448200 Lb/Hr Year Installed: 1988 NC/NOT #:
- ☐ CE (2) Baghouse (2)
Shotblasting - 2 sides, 6 hoppers, 60 bags - Outside
Rated: 7000 CFM Year Installed: 1979 NC/NOT #: 1954
- ☐ CE (5) Baghouse
Shot reclamation Murphy Rogers - Inside
Rated: 5200 CFM Year Installed: 1979 NC/NOT #:
- ☐ (7) spray booth, room or hangar (includes prep area and curing oven)
Former Description: Spray Coating Booth - Dry Filter
Drums Vented To Existing Oxidizer
Rated: 10000 CFM Year Installed: 1968 NC/NOT #: 5965
- ☐ CE (4) Afterburner
Drum Furnace 12 Mmbtu/Hr Mdh W/4 Nat Gas Mod 44-28
Rated: 36820 CFM Year Installed: 1998 NC/NOT #: 9500
- ☐ (8) spray booth, room or hangar (includes prep area and curing oven)
Former Description: Spray Coating Booth - Dry Filter
Spray Painting (Drum Lids)
Rated: 8000 CFM Year Installed: 1968 NC/NOT #:
- ☐ * (9) pickling tank
Former Description: Acid Cleaning Line
Muratic Acid Wash Line & Holdin G Tank
- ☐ CE (3) Wet scrubber
Wet Pack W/Demisters - City Water - 4" line
Rated: 2300 CFM Year Installed: 1975 NC/NOT #:
- ☐ (10) curing oven
Former Description: Oven - Drying
(Not in use)
Rated: 3 Mbtu Year Installed: 1963 NC/NOT #:
- ☐ (11) will be deleted
Former Description:

* This item does not require a Notice of Construction.

Other Control Equipment - None

Emission Summary - None for 2010 or 2011

Fee Categories for 2013 Invoice

- Reg I, 5.03(a)(2) - Facilities subject to federally enforceable emission limitations
- Reg I, 5.03(a)(4)(D) - Facilities with spray coating operations
- Reg I, 5.03(a)(5) - Facilities with gas or odor control equipment (≥ 200 cfm)
- Reg I, 5.03(a)(6) - Facilities with particulate control equipment ($\geq 2,000$ cfm)
- Reg I, 5.07(c)(2) - Facilities subject to federally enforceable emission limitations

No Outstanding Annual Invoice Fees for this Source



Puget Sound Clean Air Agency

Notice of
Construction No. 9500
Registration No. 11683
Date 9/22/2006

HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

One MegTEC Millennium 060-95 Regenerative Thermal Oxidizer for the existing Paint Curing Oven, which is presently vented to the existing Drum Reclamation Furnace Afterburner.

APPLICANT

Industrial Container Services - WA, LLC
7152 1st Ave S
Seattle, WA 98108

OWNER

Industrial Container Services - WA, LLC
7152 1st Ave S
Seattle, WA 98108

INSTALLATION ADDRESS

Industrial Container Services - WA, LLC, 7152 1st Ave S, Seattle, WA, 98108

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

DRUM RECLAMATION FURNACE

3. The drum processing rates in the reclamation furnace shall not exceed five fruit drums and one industrial drum per minute.
4. All drums processed in the reclamation furnace shall be 'drip dry' and shall contain no more than 1 inch of residue.
5. No drums shall be processed in the reclamation furnace unless the reclamation furnace afterburner chamber temperature is at least 1,700 degrees F.
6. An electronic interlock shall automatically shutdown the drum staging conveyor if the afterburner chamber temperature drops below 1,700 degrees F.
7. The afterburner chamber temperature shall be continuously recorded whenever drums are being processed in the reclamation furnace, and such records shall be retained for at least 2 years for inspection by Agency staff.
8. There shall be no visible emissions from the drum reclamation furnace exhaust.
9. The monthly (and 12-month rolling total) emissions from the afterburner shall be estimated by multiplying the hourly emission rates measured during the source test by the hours of operation of the drum reclamation furnace afterburner.
10. The monthly (and 12-month rolling total) emissions from the paint spray booths shall be estimated based on the results

Order of Approval for NC No. 9500

of a source test which shall be conducted within 90 days of the installation of the RTO in accordance with a test plan approved by the Agency.

PAINT CURING OVEN

11. The Regenerative Thermal Oxidizer (RTO) shall have a destruction efficiency of at least 98% or an outlet concentration of no more than 40 ppm, as determined by EPA Method 25A.
12. A source test shall be conducted within 90 days of the installation of the RTO to determine compliance with Condition 11 of this Order.
13. The RTO combustion chamber temperature shall be continuously monitored and recorded whenever the paint curing oven is in operation, and such records shall be retained for at least 2 years for inspection by Agency staff.
14. The RTO combustion chamber temperature shall be at least 1600 degrees F (1-hour average) or the temperature recorded during the compliance test (whichever is lower) at all times when the paint curing oven is in operation.
15. There shall be no visible emissions from the RTO.
16. This Order of Approval No. 9500 hereby cancels and supersedes Orders of Approval No. 8790 dated July 1, 2003, No. 7131 dated February 13, 1998, and No. 2976 dated January 19, 1988.

APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.

Reviewing Engineer

ns

Compliance Manager

[REDACTED]
Supervising Inspector
Puget Sound Clean Air Agency
1904 Third Ave Suite 105
Seattle, WA 98101

Re: Notification of Closed Case
CID Case No. 1000-0458 Industrial Container Services - WA LLC
[REDACTED]

Dear [REDACTED]:

This office has been conducting an investigation into alleged environmental violations pertaining to Industrial Container Services (ICS) located in Seattle, Washington. The investigation concerned allegations of violations of the Clean Air Act and the Clean Water Act, which included the dumping of large amounts of unknown chemicals into the barrel reconditioning burner located on the ICS property.

On February 11, 2014, Special Agent [REDACTED] last discussed this matter with you and several other environmental agency personnel.

This matter is now being officially referred to your office for whatever action you deem appropriate. If you have any follow-up questions or an interest in reviewing the CID enforcement file on this matter, please contact SA [REDACTED]

Sincerely,

[REDACTED]
Special Agent in Charge

Enclosure

cc: Case File

[REDACTED]
Industrial Waste Compliance Investigator
King County Waste Water
130 Nickerson St Ste 200
Seattle, WA 98109

Re: Notification of Closed Case
CID Case No. 1000-0458 Industrial Container Services - WA LLC
[REDACTED]

Dear [REDACTED]

This office has been conducting an investigation into alleged environmental violations pertaining to Industrial Container Services (ICS) located in Seattle, Washington. The investigation concerned allegations of violations of the Clean Air Act and the Clean Water Act, which included the dumping of large amounts of unknown chemicals into the local sewer treatment system.

On February 11, 2014, Special Agent [REDACTED] last discussed this matter with you and several other environmental agency personnel.

This matter is now being officially referred to your office for whatever action you deem appropriate. If you have any follow-up questions or an interest in reviewing the CID enforcement file on this matter, please contact SA [REDACTED]

Sincerely,

[REDACTED]
[REDACTED]

Enclosure

cc: Case File

